

82015/82074

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY  
Court of Appeals  
R. Scott Sprouse, Circuit Court Judge

**RECEIVED**

JAN 03 2017

**SC Court of Appeals**

Appellate Case Number: 2016-002302  
Circuit Court Case No. 2014-CP-04-00373

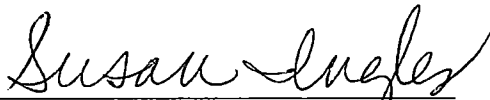
NHC HealthCare/Mauldin, LLC..... Respondent,

v.

Wade Thompson and Sheila Thompson  
Of Whom Wade Thompson is ..... Appellant.

MOTION FOR SUBSTITUION OF COUNSEL  
AND FOR EXTENSION OF TIME

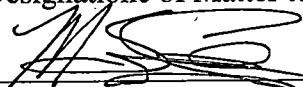
The undersigned Susan Ingles and Sharon Ward have filed a Notice of Appearance in this case as counsel for the Appellant and hereby request that the Court substitute them as counsel for the Appellant in place of Michael S. Gambrell who consents hereto and that the time to file the Initial Brief and Designation of Matter be extended by a period of ninety (90) days to afford them sufficient time to prepare the submission. The Transcript of Record was delivered to counsel for the Appellant Michael S. Gambrell on November 30, 2016 making the due date December 30, 2016. Counsel of record for Appellant and Respondent have indicated their consent to substitution and to extend the due date to March 30, 2017 by their signature hereto.



Susan Ingles S.C. Bar No. 0004577  
South Carolina Legal Services  
701 South Main Street  
Greenville, SC 29601  
susaningles@sclegal.org

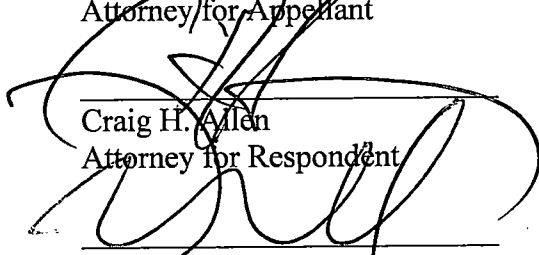
Sharon Young Ward S.C. Bar No. 76167  
16 Jamestown Rd  
Charleston, SC 29407  
sharonyoungward@bellsouth.net

We Consent to the granting of the Motion for Substitution of Counsel and for an extension of 90 days from December 30, 2016 until March 30, 2017 to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record On Appeal.



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Michael S. Gambrell  
Attorney for Appellant



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Craig H. Allen  
Attorney for Respondent

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Jay Duvall  
Guardian ad Litem for Appellant

STATE OF SOUTH CAROLINA  
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PROOF OF SERVICE

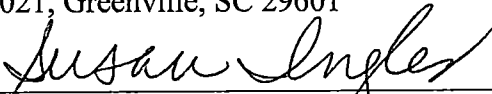
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I certify that I have served the Motion for Substitution of Counsel and Request for Extension of Time on NHC HealthCare/Mauldin, LLC, other counsel of record and the Guardian ad Litem by depositing a copy to each in the U.S. mail, postage prepaid, on December 29, 2016 on the following:

Craig H. Allen, P. O. Box 10854, Greenville, SC 29603.

Michael Gambrell, 104 South Calhoun St., Greenville, SC 29601

Jay W. Duvall, 330 E. Coffee St, Ste 5021, Greenville, SC 29601



Susan Ingles, S.C. Bar No. 0004577

South Carolina Legal Services

701 South Main Street, Greenville, SC 29601



**South Carolina  
Legal Services**

*Balancing the Scales of Justice*

701 South Main Street, Greenville South Carolina 29601  
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December 29, 2016

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201-3726

RE: NHC HealthCare/Mauldin, LKLC vs. Wade Thompson and Sheila Thompson of whom  
Wade Thompson is the Appellant  
Appellate Case No. 2016-002302

Dear Ms. Kitchings:

**RECEIVED**

Enclosed for filing in the above referenced case are the following:

JAN 03 2017

**SC Court of Appeals**

- 1) Notice of Appearance;
- 2) Proof of Service of Notice of Appearance;
- 3) Motion for Substitution of Counsel and Request for Extension of Time (original and 6 copies);
- 4) Proof of Service for the Substitution of Counsel and Request for Extension of Time; and
- 5) \$50.00 for filing fees for the aforementioned Motions (Substitution and Extension)

Thank you for your consideration of this submission. Please let me know if anything further is needed.

Sincerely,

Susan Ingles  
S.C. Bar No. 0004577  
South Carolina Legal Services

Encl.

cc: Craig H. Allen  
Michael S. Gambrell  
Jay W. Duvall

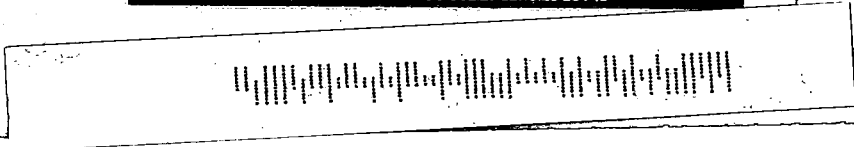
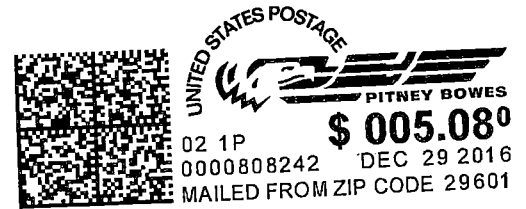


J

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**CERTIFIED MAIL**  
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE



**South Carolina  
Legal Services**

*Balancing the Scales of Justice*

701 South Main Street  
Greenville, SC 29601

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JAN 03 2017

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211