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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2016-001551

RECEIVED

JAN 31 2017

SC Court of Appeals

Christy Byrd, as Next Friend of Julia B., a minor, Appellant,

v.

McLeod Physician Associates II and Dr. John B. Browning, Respondents.

**MOTION FOR EXTENSION OF TIME TO
FILE THE INITIAL BRIEF**

COMES NOW, the Appellant, Christy Byrd, as Next Friend of Julia B., a minor, by and through their undersigned counsel, and hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 10 days to file the Initial Brief in this action. The Transcript of Trial was received on January 3, 2017. Accordingly, the current deadline is February 2, 2017. An extension from this date is February 12, which falls on a Sunday. The new deadline would be properly set for February 13, 2017. Counsel for the Respondents has no objection. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.

WHEREFORE, Appellant respectfully requests until **February 13, 2017** in which to file the Initial Brief in this action.

GRAHAM LAW FIRM, P.A.



Edward L. Graham (SC Bar: 2483)
J. Layton Ruffin (SC Bar: 78267)
Diane M. Rodriguez (SC Bar: 11274)
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Attorneys for Appellants

January 30, 2017

Other Counsel of Record:
Elloree A. Gaines
Molly H. Craig
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Post Office Box 1508
Charleston, SC 29402

Attorneys for Respondent

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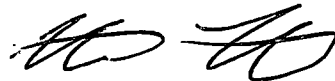
v.

McLeod Physician Associates II and Dr. John B. Browning, Respondents.

PROOF OF SERVICE

I certify that I have served the Appellant's **Motion for Extension of Time to File the Initial Brief** on the Respondents on this, the 30th Day of January, 2017, addressed to their attorneys of record, Ellore A. Gaines and Molly H. Craig, **Hood Law Firm, LLC**, Post Office Box 1508, Charleston, SC 29402.

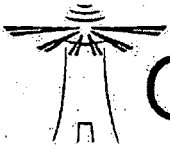
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January 30, 2017



GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

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Certified Civil Court Mediator

January 30, 2017

Elloree A. Gaines
Molly H. Craig
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Re: *Christy Byrd, as Next Friend of Julia B., a minor, Appellant, v. McLeod Physician Associates II and Dr. John B. Browning, Respondents.*
Appellate Case No. 2016-001551

Dear Ms. Gaines:

Enclosed is the Appellant's **Motion for Extension of Time to File the Initial Brief** in the above case, which I hereby serve upon you.

Very truly yours,

J. Layton Ruffin

Enclosures

cc: The Honorable Jenny Abbott Kitchings



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January 30, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *Christy Byrd, as Next Friend of Julia B., a minor, Appellant, v. McLeod Physician Associates II and Dr. John B. Browning, Respondents.*
Appellate Case No. 2016-001551

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the **Appellant's Motion for Extension of Time to File the Initial Brief**, along with a certificate of mailing. Please file the original and copies and return a clocked stamped copy to us in the envelope provided for your convenience. Also, enclosed is our law firm's check in the amount of \$25.00 for the filing fee.

Thank you for your attention to this matter.

Very truly yours,

J. Layton Ruffin

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SC Court of Appeals

Enclosures

cc: Ellore A Gaines Esq
Molly H. Craig Esq



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TO:

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