

Reply to: **Carmen V. Ganjehsani**  
Direct Dial: 803-253-8692  
cganjehsani@richardsonplowden.com

May 3, 2017

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MAY 05 2017

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**Re: *Lorrie Dibernardo, individually and as the Personal Representative of the Estate of Anthony Dibernardo, Deceased v. Carolina Cardiology Associates, PA and Naresh Mori, MD***  
**Appellate Case No. 2016-002008**  
**RPR File No.: 4180-162**

Dear Ms. Kitchings:

As counsel for the Respondents Carolina Cardiology Associates, PA and Naresh Mori, MD, we respectfully request a 30-day extension of time in which to serve and file our Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal. The Brief and Designations are currently due on Monday, May 8, 2017. However, with a 30-day extension of time, they would be due on Wednesday, June 7, 2017.

We find it necessary to request this extension due to our workload, which has included the preparation of several filings with the United States District Court for South Carolina, including a motion for summary judgment, and an appellee brief with the United States Court of Appeals for the Fourth Circuit. The undersigned has contacted counsel for the Appellant who consents to this extension request. This is our first request for an extension of time to serve and file the Initial Respondents' Brief and Designation of Matter.

I am enclosing the \$25.00 filing fee and thank you for your consideration of this request. By copy of this letter, I am notifying counsel of record of this correspondence.

Sincerely,

  
Carmen V. Ganjehsani

Enc.

cc: Chad A. McGowan, Esq.  
Whitney B. Harrison, Esq.  
George C. Beighley, Esq. (FYI)



4180-162

**RICHARDSON**  
RICHARDSON PLOWDEN ROBINSON, P.A.  
**PLOWDEN**  
ATTORNEYS AT LAW

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