

83479

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

RECEIVED
MAY 22 2017
SC Court of Appeals

Case No. 2016-CP-26-3317
Appellate Case No. 2017-000254

Paul Sasser, M.D., Mark R. Borowicz, M.D., Lane Ingram Moore, M.D.,
FACS and Goatee Vascular, LLC.....Appellants,

v.

Dominick Ronga, Mid Atlantic Vascular, LLC and Fresenius Vascular
Care Myrtle Beach MSO, LLC.....Respondents.

APPELLANTS' SECOND MOTION
FOR EXTENSION OF TIME

Pursuant to the South Carolina Appellate Court Rules, Appellants, by and through their undersigned counsel, hereby move the Court for an Order granting Appellant an additional 30-day extension of time, until June 29, 2017, in which to file Appellant's Initial Brief and Designation of Matter. Appellant would submit that this extension is necessary due to counsel's current work commitments and the time necessary to be devoted to preparing these documents.

Appellant would further submit that no prejudice will inure to the Respondents by the granting of this Motion.



Thomas C. Brittain, Esq. (SC Bar #00893)
The Brittain Law Firm, P.A.
4614 Oleander Drive
Myrtle Beach, South Carolina 29577
843-449-8562
Attorney for Appellant

May 19, 2017
Myrtle Beach, SC

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

MAY 22 2017

SC Court of Appeals

Case No. 2016-CP-26-3317
Appellate Case No. 2017-000254

Paul Sasser, M.D., Mark R. Borowicz, M.D., Lane Ingram Moore, M.D.,
FACS and Goatee Vascular, LLC.....Appellants,

v.

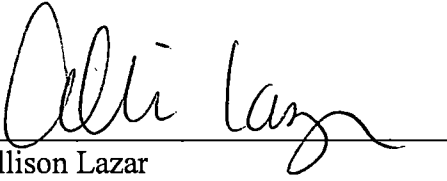
Dominick Ronga, Mid Atlantic Vascular, LLC and Fresenius Vascular
Care Myrtle Beach MSO, LLC.....Respondents.

PROOF OF SERVICE

I, Allison Lazar, do hereby certify that I am an employee of THE BRITAIN LAW FIRM, P.A., attorneys for the Appellants Paul Sasser, M.D., Mark R. Borowicz, M.D., Lane Ingram Moore, M.D., FACS and Goatee Vascular, LLC in the above-entitled action, and that I have this 19th day of May, 2017, caused to be served upon the following parties the **Appellant's Second Motion for Extension** by depositing a copy of same in the United States Mail, with sufficient first class postage affixed thereto, addressed as follows:

Robert Calamari, Esq.
A. Mattison Bogan, Esq.
Nelson Mullins
BNC Bank Corporate Center, Suite 300
3751 Robert M. Grissom Parkway
Myrtle Beach, SC 29577

Stephen M. Cox, Esq.
Robinson, Bradshaw & Hinson, P.A.
140 East Main Street, Suite 420
Rock Hill, SC 29730


Allison Lazar

SWORN AND SUBSCRIBED before me
this 11th day of May, 2017.


NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 5/2/2021

THE BRITTAIN LAW FIRM, P.A.

ATTORNEYS AT LAW
4614 OLEANDER DRIVE
MYRTLE BEACH, SOUTH CAROLINA 29577

THOMAS C. BRITAIN
MARY MADISON BRITAIN LANGWAY
A. PRESTON BRITAIN
T. CASE BRITAIN, JR.

843-449-8562
FAX 843-497-6124
www.brittainlawfirm.com

May 19, 2017

RECEIVED

MAY 22 2017

SC Court of Appeals

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

Re: Paul Sasser, M.D., Mark R. Borowicz, M.D., Lane Ingram Moore, M.D., FACS
and Goatee Vascular, LLC v. Dominick Ronga, Mid Atlantic Vascular, LLC and
Fresenius Vascular Care Myrtle Beach MSO, LLC
Appellate Case No. 2017-000254

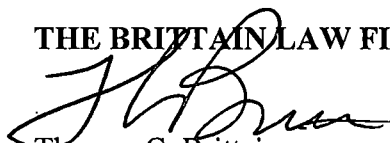
Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Second Motion for Extension of Time to file and serve Appellants' Initial Brief and Designation of Matter together with the Proof of Service and filing fee of \$25.00.

Please return one clocked-in copy of the Motion and Proof of Service to our office in the enclosed self-addressed stamped envelope.

With warm regards, I am
Yours truly,

THE BRITTAIN LAW FIRM, P.A.



Thomas C. Brittain
TCB/all

cc: Robert Calamari, Esquire
A. Mattison Bogan, Esquire
Stephen M. Cox, Esquire

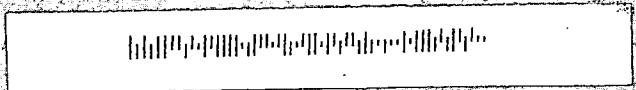
↓

\$2.24
US POSTAGE
FIRST-CLASS
062S0008050323
29577

B3282.19



RECEIVED
MAY 22 2017
SC Court of Appeals



THE BRITAIN LAW FIRM, P.A.
ATTORNEYS AT LAW
4614 OLEANDER DRIVE
MYRTLE BEACH, SOUTH CAROLINA 29577

TO:

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