

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS
THE HONORABLE R. SCOTT SPROUSE
CIRCUIT COURT JUDGE

RECEIVED
JUN 08 2017
SC Court of Appeals

APPELLATE CASE NO. 2016-002008
CIVIL ACTION NO. 2015-CP-46-00882

Lorrie Dibernardo, individually and as the
Personal Representative of the Estate of
Anthony Dibernardo, deceased,

APPELLANT,

versus

Carolina Cardiology Associates, PA and
Naresh Mori, MD,

RESPONDENTS.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondents, Carolina Cardiology Associates, PA and Naresh Mori, MD, and Designation of Matter to be Included in the Record on Appeal were originally due on May 8, 2017. At the Respondents' request, the Court granted a 30-day extension of time, until June 7, 2017, to serve and file the Respondents' Initial Brief and Designation of Matter. The Respondents, Carolina Cardiology Associates, PA and Naresh Mori, MD, respectfully request the Court to grant a second extension of 30 days,

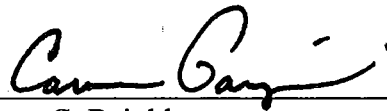


or until Friday, July 7, 2017, to serve and file their Initial Brief of Respondents and Designation of Matter.

Counsel for the Respondents requests a second extension due to having taken leave during the month of May for childcare purpose. Counsel has also been working on another appeal due in this Court on June 9, 2017.

Counsel for Respondents has contacted Appellant's counsel and she consents to this request as indicated in the attached document.

Accordingly, the Respondents, Carolina Cardiology Associates, PA and Naresh Mori, MD, respectfully request an additional 30-day extension of time in which to serve and file their Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal.



George C. Beighley
Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
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Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR RESPONDENTS
CAROLINA CARDIOLOGY ASSOCIATES,
PA AND NARESH MORI, MD**

June 6, 2017.

EXHIBIT “A”

Carmen Ganjehsani

From: Whitney Harrison <wharrison@mcgowanhood.com>
Sent: Tuesday, June 06, 2017 8:09 AM
To: Carmen Ganjehsani
Subject: Re: Di Bernardo

Good morning,

I don't mind at all. Hope you're doing well.

Whitney

On Jun 6, 2017, at 8:04 AM, Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com> wrote:

Whitney, do you mind if I obtain a second extension for the brief? Thanks so much, Carmen

Sent from my iPhone. Please excuse any errors.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondents, Carolina Cardiology Associates, PA and Naresh Mori, MD, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated June 6, 2017, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Whitney B. Harrison
MCGOWAN, HOOD & FELDER, LLC
1517 Hampton Street
Columbia, SC 29201

Chad A. McGowan
MCGOWAN, HOOD & FELDER, LLC
1539 Health Care Drive
Rock Hill, SC 29732
Attorneys for Appellant

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**ATTORNEYS FOR RESPONDENT
CAROLINA CARDIOLOGY ASSOCIATES,
PA AND NARESH MORI, MD**

Dated: June 6, 2017.

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

June 6, 2017

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

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Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Respondents' Motion for Extension of Time to file the Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on counsel for the Appellant.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

Encs.

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

Hasler FIRST-CLASS MAIL

06/06/2017

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The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
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