

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

RECEIVED

JUL 13 2017

SC Court of Appeals

Case No. 2015-CP-46-00882
Appellate Case No. 2016-002008

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

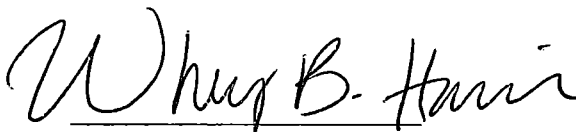
v.

Carolina Cardiology Associates, PA and Naresh Mori, MD..... Respondents,

MOTION FOR EXTENSION

Appellant respectfully requests a fifteen (15) day extension of time to file the Reply Brief in this matter due to a previously scheduled vacation and counsel's involvement in a trial the week of June 26, 2017. The current deadline is July 16, 2017. If granted, the new deadline for the Initial Brief would be July 31, 2017. Counsel has conferred with Respondents' counsel, who has consented to this requested extension.

Respectfully submitted,



July 13, 2017
Columbia, SC

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
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(803) 779-0100
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ATTORNEY FOR APPELLANT

THE STATE OF SOUTH CAROLINA

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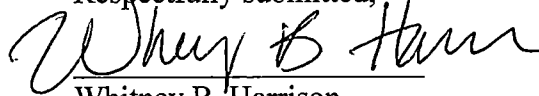
PROOF OF SERVICE

The undersigned hereby certifies that on July 13, 2017 she served counsel for Respondent with the *Motion for Extension* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

George Beigley & Carmen Vaughn Ganjehsani
P.O. Drawer 7788
Columbia, SC 29202

July 13, 2017
Columbia, SC

Respectfully submitted,



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Of Counsel*

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July 13, 2017

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

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SC Court of Appeals

RE: *Lorrie Dibernardo v. Carolina Cardiology*
Appellate Case No. 2016-002008

Dear Ms. Kitchings,

I am writing to seek a fifteen (15) day extension of time to file an Initial Brief. The current deadline is July 16, 2017. If granted, the new deadline for the Initial Brief would be July 31, 2017. I ask that all filing deadlines be held in abeyance pending a decision on this request for an extension.

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension. Please return a clocked copy of the Motion. I am also enclosing a check from our firm in the amount of \$25.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

A handwritten signature in cursive script that reads 'Whitney B. Harrison'.

Whitney B. Harrison

Enclosures

cc: George Cox Beighley, Esquire
Carmen Vaughn Ganjehsani, Esquire