

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2012-CP-38-0845

RECEIVED

AUG 18 2017

SC Court of Appeals

Ralph C. Williams, Sr., and Linda Williams, Appellants,

v.

Patricia A. Johnson, Josette Peppers
and UniHealth Post-Acute Care – Orangeburg, LLC Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, appellants request a 30-day extension of the deadline for filing their initial brief and designation of matter to be included in the record on appeal. The current deadline is July 19, 2017. This is the third request for an extension of this deadline.

Appellant’s counsel posits the following extraordinary circumstances supporting this request:

- A. Counsel continues to experience delays in caseload caused by his participation in an expedited matter before the Supreme Court of South Carolina from April to June 2017.
- B. Counsel has been continuing to deal with unexpected family illness in Florence, South Carolina, which has required his assistance and resulted in unexpected trips to Florence.

- C. Appellant's counsel has suffering from the flu since August 11, 2017, which has interfered with counsel's work load.

August 18, 2017

Respectfully Submitted,



John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Appellants

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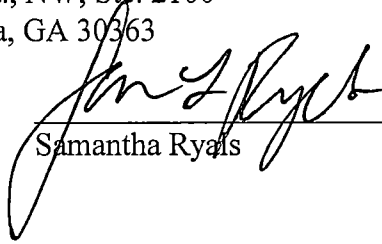
PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

Tyler L. Arnold
Arnall Golden Gregory, LLP
1626 Jeurgens Ct
Norcross, GA 30093

Jason E. Bring
Arnall Golden Gregory, LLP
171 17th St., NW, Ste. 2100
Atlanta, GA 30363

August 18, 2017



Samantha Ryals



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

August 18, 2017

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

AUG 18 2017

SC Court of Appeals

RE: Ralph C. Williams, Sr., et al v. Patricia A. Johnson, et al
Case Tracking No.: 2017-000963

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in this case. I have also enclosed a proof of service on counsel for respondents and our firm check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Samantha Ryals

Paralegal to John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/slr

Enclosures

cc: Robert P. Foster, Esquire
Javá O. Warren, Esquire
Tyler L. Arnold, Esquire
Jason E. Bring, Esquire