

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

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS
THE HONORABLE BRIAN M. GIBBONS
CIRCUIT COURT JUDGE

RECEIVED

OCT 31 2017

APPELLATE CASE NO. 2017-001271
CIVIL ACTION NO. 2015-CP-46-2454

SC Court of Appeals

Wayne H. Copeland as the PR of the
Estate of Dorothy H. Copeland, deceased

APPELLANT,

versus

Carolina Pulmonary Physicians, P.A.,

RESPONDENT.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondent, Carolina Pulmonary Physicians, P.A., and Designation of Matter to be Included in the Record on Appeal were originally due on September 29, 2017. At the Respondent's request, the Court granted a 30-day extension of time, until October 30, 2017, to serve and file the Respondent's Initial Brief and Designation of Matter. The Respondent, Carolina Pulmonary Physicians, P.A., respectfully requests the Court to grant a second extension of 30 days, or until Wednesday, November 29, 2017, to serve and file its Initial Brief of Respondent and Designation of Matter.

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Counsel for the Respondent requests a second extension due to the filing of a brief with the United States Court of Appeals for the Fourth Circuit and due to a sick child.

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

Accordingly, the Respondent, Carolina Pulmonary Physicians, P.A., respectfully requests an additional 30-day extension of time in which to serve and file its Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.



Barbara A. Chesley
Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR RESPONDENT
CAROLINA PULMONARY
PHYSICIANS, P.A**

October 30, 2017.

EXHIBIT “A”

Carmen Ganjehsani

From: David A. Manzi <damesq@earthlink.net>
Sent: Thursday, October 26, 2017 11:55 AM
To: Carmen Ganjehsani
Subject: Re: Copeland v. Carolina Pulmonary

Yes. No problem

David

Sent via the Samsung Galaxy S8+, an AT&T 4G LTE smartphone

----- Original message -----


From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Date: 10/26/17 11:29 AM (GMT-05:00)
To: "David A. Manzi (damesq@earthlink.net)" <damesq@earthlink.net>
Subject: Copeland v. Carolina Pulmonary

David,

I was wondering if I could possibly have another extension to file my brief. I am working on it, but have had a number of briefs due lately and now my daughter has just gotten sick. I would greatly appreciate your consent.

Thank you,


Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Special Counsel Cganjehsani@RichardsonPlowden.com	
	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com	

CERTIFICATE OF SERVICE

I, the undersigned, attorney Respondent Carolina Pulmonary Physicians, P.A., do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated October 30, 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:

David A. Manzi
SCHILLER & HAMILTON
1057 Red Ventures Drive, Suite 145
Fort Mill, SC 29707
Attorney for Appellant



Carmen V. Ganjehsani
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**ATTORNEYS FOR RESPONDENT
CAROLINA PULMONARY PHYSICIANS,
P.A.**

Dated: October 30, 2017.

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SC Court of Appeals

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

October 30, 2017

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

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OCT 31 2017

Re: ***Copeland v. Carolina Pulmonary Physicians, P.A.*** SC Court of Appeals
Appellate Case No. 2017-001271
RPR File No.: 4180-135

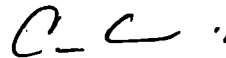
Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Respondent's Motion for Extension of Time to file the Initial Respondent's 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

CVG

Encs.

cc: David A. Manzi
Barbara A. Chesley (FYI)



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4180-135

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

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

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