

The State of South Carolina  
In The Court of Appeals

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Appeal from Charleston County  
Hon. Deadre Jefferson, Circuit Court Judge

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Trial Court Case No. 2014-CP-10-4591  
Appellate Case No. 2017-002392

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**RECEIVED**  
FEB 12 2018  
SC Court of Appeals

Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe, Appellant,

v.

City of North Charleston, Leigh Anne McGowan, individually,  
Charles Francis Wholleb, individually, and Anthony M. Doxey, individually,  
Respondents

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**Motion to Extend Time**

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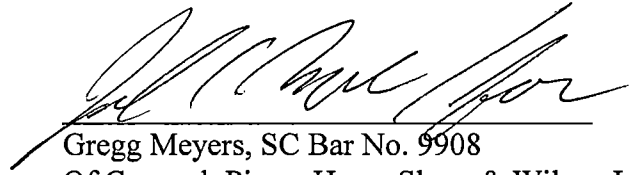
The plaintiff moves to extend by 30 days the time for the initial brief in this appeal.

At present, the initial brief and designation is due February 12. Shortly after the order establishing that date, counsel had emergency surgery for a detached retina. That surgery took place out of state. It will not be known for some months if that surgery has been successful, but counsel has not yet been fully cleared to return to South Carolina to resume law practice.

An extension of 30 days should enable counsel to have time to resume practice and prepare the initial brief and designation.

*Signature to follow*

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregg Meyers", written over a horizontal line.

Gregg Meyers, SC Bar No. 9908  
Of Counsel, Pierce Hems Sloan & Wilson LLC  
321 East Bay Street  
Charleston SC 29401  
843-722-7733, 843-722-7732 facsimile  
greggmeyers@phswlaw.com

Other counsel of Record:

Chris Dorsel  
Senn Legal, LLC  
3 Wesley Drive  
Charleston SC 29407

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**Proof of Service**

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I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

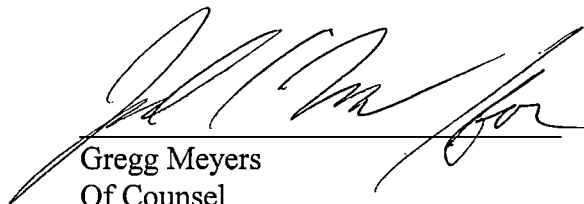
**Motion to Extend Time**

By placing a copy of the documents in the United States mail, first-class postage pre-paid,  
addressed to:

Chris Dorsel  
Senn Legal, LLC  
3 Wesley Drive  
Charleston SC 29407

Done February 9, 2018.

*Signature to follow*



Gregg Meyers  
Of Counsel

Pierce Hems Sloan & Wilson LLC

321 East Bay Street

Charleston SC 29401

843-722-7733, 843-722-7732 facsimile

[greggmeyers@phswlaw.com](mailto:greggmeyers@phswlaw.com)

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February 9, 2018

**Via First Class Mail:**

Honorable V. Clair Allen  
The South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Jane Doe 202 v. North Charleston  
Appellate Case No. 2017-002392  
File No. GM0023

**RECEIVED**

FEB 12 2018

SC Court of Appeals

Dear Ms. Allen:

Enclosed for filing with the Court please find an original and 6 copies of Appellant's Motion to Extend Time and Proof of Service. I have enclosed the required \$25.00 motion fee. By copy of this letter with enclosure, I am serving Defendants' counsel with same.

With kind regards,

Sincerely,



Mary Grondines  
Paralegal to Gregg Meyers

cc: Christopher Dorsel, Esquire (w/ encl.)

✓



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MAILED FROM ZIP CODE 29401

**PIERCE, HERNS, SLOAN & WILSON, LLC**

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FEB 12 2018  
SC Court of Appeals

**Via First Class Mail:**

Honorable V. Clair Allen

The South Carolina Court of Appeals

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