

84212

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
MAR 19 2018
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 THE COURT TO REOPEN RECORD ON APPEAL DEADLINE
AND ALLOW SERVICE OF THE RECORD OUT OF TIME**

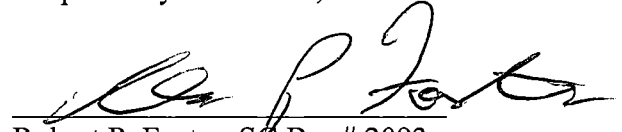
Pursuant to Rules 240 and 263(b), SCACR, Appellants hereby move this Court to
reopen the deadline for serving the record on appeal. The record on appeal was due to
be served February 12, 2018.

Yesterday counsel discovered the deadline for serving the record on appeal was
not calendared. Thus, the record was not prepared or served on the Respondents.
Appellants respectfully request 10 days from this filing to serve the record on appeal.

/Signature page attached

March 14, 2018

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Robert P. Foster", written over a horizontal line.

Robert P. Foster, SC Bar # 2093

Foster Law Firm, LLC

601 E. Mcbee Ave., Ste. 104

Greenville, SC 29601

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Attorney for Appellants

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served for the Respondents with a copy of the Motion For The Court To Reopen Record On Appeal Deadline And Allow Service Of Record Out Of Time by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

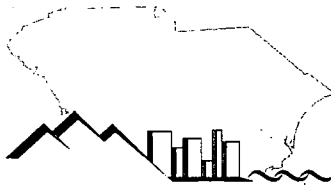
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March 14, 2018



Daun Goins, Paralegal
Foster Law Firm, LLC



PAUL J. FOSTER, JR., 1928-1999
ROBERT E. HOSKINS, 1965-2016

FOSTER LAW FIRM, L.L.C.

Attorneys and Counselors at Law

Robert P. Foster
rfoster@fosterfoster.com
GREENVILLE

March 14, 2018

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

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SC Court of Appeals

Re: *Ralph C. Williams, Sr. and Linda Williams v. Patricia A. Johnson, Josette Peppers, and UniHealth Post-Acute Care-Orangeburg, LLC*
Case Tracking No.: 2017-000963

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of a Motion For The Court To Reopen Record On Appeal Deadline And Allow Service Of Record Out Of Time 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 copies to me in the enclosed self-addressed envelope.

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.

With kind regards,

Yours very truly,

Robert P. Foster

RPF/dg

Enclosure

Cc: Tyler Arnold, Esq.
Jason Bring, Esq.
Java Warren, Esq.

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