

87841

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge  
Deadra L. Jefferson, Circuit Court Judge

**RECEIVED**  
SEP 17 2018  
SC Court of Appeals

Case No. 2011-CP-10-08011  
Appellate Case No. 2018-000460

Assistive Technology Medical  
Equipment Services, LLC, ..... Respondent,

v.

Hood & Selander, CPAS, LLC; Donna C. Cash,  
as Personal Representative of the Estate of  
Dorothy A. Connelly; W.E. Applegate, III,  
as Personal Representative of the Estate of  
James B. Connelly, Kimberly Cuce; Phillip DeClemente, ..... Defendants,

Of whom Phillip DeClemente is the ..... Appellant.

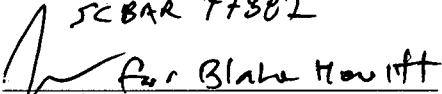
**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, respondent requests a 30-day extension of the  
deadline for filing its initial brief and designation of matter to be included in the record  
on appeal. The current deadline is September 17, 2018. This is the second request for  
an extension of this deadline.

/Signature page attached

September 17, 2018

Respectfully submitted,

*SCBAR 77802*  
  
For Blake Hewitt

Blake A. Hewitt # 73674

BLUESTEIN THOMPSON SULLIVAN, LLC

PO Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondent

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Of whom Phillip DeClemente is the ..... Appellant.

**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served  
counsel for the Appellant 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 address:

Cameron L. Marshall  
7 Gamecock Ave, Ste 707  
Charleston, SC 29407-3379

  
Erin Bridges

September 17, 2018

September 17, 2018

VIA HAND DELIVERY

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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SEP 17 2018  
SC Court of Appeals

Re: Assistive Technology Medical v. Phillip DeClemente  
Case Tracking No. 2018-000460

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have enclosed a proof of service of this document on counsel for the Appellant and a \$25.00 check 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,



Erin Bridges  
Paralegal to Blake A. Hewitt  
Bluestein Thompson Sullivan, LLC

/emb

Enclosures

cc: James E. Smith, Jr., Esquire  
Cameron L. Marshall, Esquire