

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

Appeal from Charleston County
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2018-001842
Circuit Court Case No. 2018-CP-10-1163

RECEIVED

APR 22 2019

SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

Dr. George H. Khoury and Bon Secours St.
Francis West Ashley,

Respondents.

RESPONDENTS' FIRST MOTION FOR EXTENSION

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown
Joseph J. Tierney, Jr.
Russell G. Hines
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for Respondents

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Respondents Dr. George H. Khoury and Bon Secours St. Francis West Ashley, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Respondents previously sent a letter to this Court seeking a first extension under the belief that its initial brief was due March 4, 2019. However, due to the fact that Appellant's initial filings contained deficiencies, which were noted by the Court after Respondents originally sought their first extension by letter, and which the last of the deficiencies was corrected on March 22, 2019, Respondents believe their present deadline, without any extensions, is April 22, 2019. On account of work-related and other time commitments, Respondents respectfully request that this deadline be extended by 30 days (from April 22, 2019), i.e., through May 22, 2019. Respectfully, Respondents believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondents move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief

and designation of matter would be May 22, 2019, according to the undersigned's calculations. Further, Respondents respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown

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Russell G. Hines

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P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

Attorneys for Respondents

Charleston, South Carolina

Dated: 4/22/19

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PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
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Attorneys for Respondents

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **RESPONDENTS' FIRST MOTION FOR EXTENSION** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on April 22, 2019, addressed as follows:

Thelma R. Garrick
195 Crescent Oaks Ct.
Orangeburg, SC 29115
Pro Se Appellant

YOUNG CLEMENT RIVERS, LLP

By:

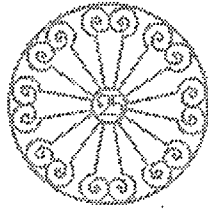


Russell G. Hines

Attorneys for Respondents

Charleston, South Carolina

Dated: 4/22/19



YCR LAW

Russell G. Hines
Partner

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April 22, 2019

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SC Court of Appeals

VIA FACSIMILE AND US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Thelma R. Garrick v. Dr. George H. Khoury, Bon Secours St. Francis West
Ashley
Appellate Case No. 2018-001842
Case No.: 2018-CP-10-1163
YCR File: 3810-20180252 / 15499-20180314

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of **Respondents' First Motion for Extension**. Also enclosed are the original and two (2) copies of a **Proof of Service** regarding the same as well as our firm's check in the amount of \$50.00 to cover the cost of filing this motion.

Kindly return one (1) stamped copy to us in the envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Russell G. Hines
Partner

RGH/amj

Enclosures

cc: Thelma R. Garrick