

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

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Appeal from Charleston County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

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

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**RECEIVED**

MAR 04 2019

SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

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**NOTICE OF APPEARANCE  
ON BEHALF OF RESPONDENTS**

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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*

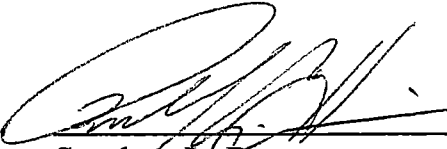
TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Stephen L. Brown and Russell G. Hines, both of Young Clement Rivers, LLP, hereby give notice of their appearance as counsel for Dr. George H. Khoury and Bon Secours St. Francis West Ashley in the above-captioned appeal.

Stephen L. Brown and Russell G. Hines will represent the Respondents in conjunction with Joseph J. Tierney, Jr., also of Young Clement Rivers, LLP. They further request that the pro-se Appellant and the Clerk of Court please add them to their respective service lists on behalf of the Respondents in this appeal.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
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*

Charleston, South Carolina

Dated: 2/25/19

**THE STATE OF SOUTH CAROLINA  
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Court of Common Pleas

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Appellate Case No. 2018-001842  
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Thelma R. Garrick,

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

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**SC Court of Appeals**

Appellant,

Respondents.

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**PROOF OF SERVICE**

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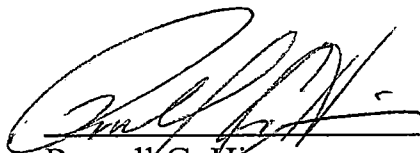
YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph J. Tierney, Jr.  
Russell G. Hines  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Respondents*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **NOTICE OF APPEARANCE ON BEHALF OF RESPONDENTS** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on February 28, 2019, addressed as follows:

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

YOUNG CLEMENT RIVERS, LLP

By:

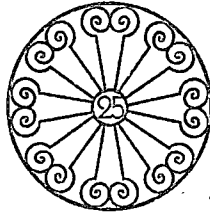


Russell G. Hines

***Attorneys for Respondents***

Charleston, South Carolina

Dated: 2/28/19



# YCR LAW

Russell G. Hines  
Partner

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

February 28, 2019

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

**RECEIVED**  
MAR 04 2019  
SC Court of Appeals

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 one copy of a Notice of Appearance and a Proof of Service regarding the same. I would appreciate it if you would file the original and return a court-stamped copy to me using the pre-stamped envelope provided.

Additionally, and on behalf of Dr. George H. Khoury and Bon Secours St. Francis West Ashley, and pursuant to Rule 263(b), SCACR, I hereby respectfully request a 30-day extension of time to file/serve the Initial Brief of Respondents and the Respondents' Designation of Matter to be included in the Record on Appeal in the above-referenced matter. Our firm's check in the amount of \$50 is enclosed to cover the cost of this request.

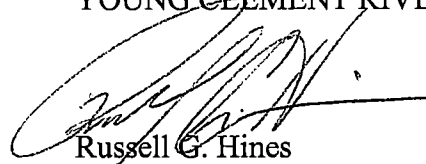
The present deadline is Monday, March 4, 2019, and I would ask that the Court hold this deadline in abeyance until it acts upon this request. This request is made in light of work-related and other time commitments, and I believe it to be consistent with the interests of justice and not unduly prejudicial to the Appellant. By my calculations, with the requested extension, the Respondents' initial brief and designation of matter will be due on or before April 3, 2019.

Of course, if you have any questions or concerns or if a formal motion is required for the Court to consider the requested extension, please just let me know.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

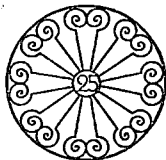
A handwritten signature in black ink, appearing to read "Russell G. Hines", written over a horizontal line.

Russell G. Hines  
Partner

RGH/amj

Enclosures

cc: Thelma R. Garrick



**YCR LAW**

Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400  
P.O. Box 993  
CHARLESTON, SC 29402

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