

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

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MAY 22 2019
SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

**RESPONDENTS' SECOND MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF AND DESIGNATION OF MATTER**

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.

Presently, by order of this Court filed May 14, 2019, the deadline for Respondents' initial brief and designation of matter is today, May 22, 2019. On account of work-related and other time commitments, Respondents respectfully request that this deadline be extended by 30 days (from May 22, 2019), i.e., through June 21, 2019. Respectfully, Respondents believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

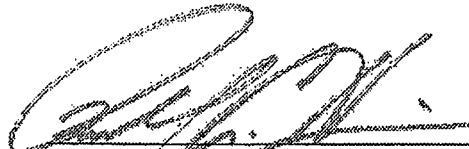
WHEREFORE, Respondents move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be June 21, 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

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: 5/22/19

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Thelma R. Garrick,

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PROOF OF SERVICE

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I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **RESPONDENTS' SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF AND DESIGNATION OF MATTER** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on May 22, 2019, addressed as follows:

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

YOUNG CLEMENT RIVERS, LLP

By:

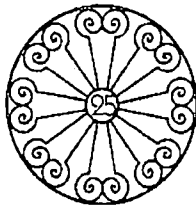


Russell G. Hines

Attorneys for Respondents

Charleston, South Carolina

Dated: 5/22/19



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

May 22, 2019

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SC Court of Appeals

VIA US MAIL AND FASCIMILE

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 please find the original and seven (7) copies of Respondent's Second Motion for Extension of Time to File/Serve Initial Brief and Designation of Matter together with the original and (1) copy of the Proof of Service for same and our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return a court-stamped copy of each to me in the enclosed envelope.

With best wishes and kindest regards, I am

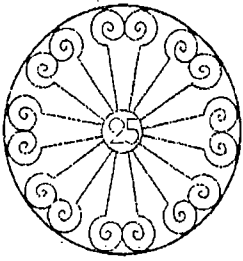
Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

Cc: Thelma R. Garrick



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Young Clement Rivers, LLP

All Business, Insurance, Real Estate and Regulatory Matters
Admiralty/Marine • Appellate • Commercial Litigation
Commercial Real Estate • Commercial Transactions
Community Association Law • Construction Law
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To: 18037341839
From: kbarnes@ycrlaw.com
Date: May 22, 04:31:38 PM EDT
Subj: Garrick v. Khoury, et al; Case No.: 2018-001842
Pages: 7

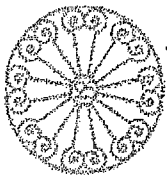
Good afternoon,

Attached please find correspondence with regard to our motion for extension to petition for rehearing. The originals, all required copies and the filing fee have been placed in the mail. Please do not hesitate to let me know if you need anything further.

Thanks so much!

Katy B. Barnes
Commercial Litigation Secretary to
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines
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