

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

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Appeal from Charleston County  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

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Case No. 2011-CP-10-0934

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**S.C. SUPREME COURT**

On Petition for a Writ of Certiorari to the Court of Appeals

Opinion No. 5403 (S.C. Ct. App. filed May 4, 2016)

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Supreme Court Case No. 2016-001936

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Virginia L. Marshall and Todd W. Marshall,

Respondents,

v.

Kenneth A. Dodds, M.D., Charleston Nephrology Associates, LLC,  
Georgia Roane, M.D., and Rheumatology Associates, P.A.,

Petitioners.

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**MOTION OF PETITIONERS GEORGIA ROANE, M.D., AND  
RHEUMATOLOGY ASSOCIATES, P.A., FOR EXTENSION OF TIME  
TO FILE/SERVE REPLY BRIEF**

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YOUNG CLEMENT RIVERS, LLP  
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D. Jay Davis, Jr. (SC Bar No. 12084)  
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*Counsel for Petitioners  
Georgia Roane, M.D., and  
Rheumatology Associates, P.A.*

TO: THE HONORABLE JUSTICES OF THE SUPREME COURT OF SOUTH CAROLINA

COME NOW Petitioners Georgia Roane, M.D., and Rheumatology Associates, P.A. (hereinafter collectively referred to in the singular as “Dr. Roane”), by and through their undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, as well as the Court’s order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, hereby move this Honorable Court for an extension of five (5) days’ time to file/serve Dr. Roane’s Reply Brief in this matter.

1. The Court granted the petitions for a writ of certiorari in this matter by order of August 22, 2017.

2. In accordance with Rule 242(i), SCACR, Dr. Roane filed/served her brief on September 21, 2017, within thirty (30) days after the Court’s granted her petition for a writ of certiorari.

3. By order of October 19, 2017, the Court extended the deadline for the Brief of Respondents until November 6, 2017, and, thereafter, Respondents filed/served their brief on November 6, 2017, making Dr. Roane’s deadline for filing/serving any reply brief today, November 16, 2017, according to Rule 242(i).

4. Due to other time commitments, both work- and non-work-related, the undersigned asks the Court for five (5) days’ additional time beyond today’s date,

i.e., beyond November 16, 2017, to file/serve a reply brief on behalf of Dr. Roane, and the undersigned humbly submits that there is sufficient cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.<sup>1</sup>

WHEREFORE, Dr. Roane respectfully requests that this Honorable Court allow her five (5) days from today, November 16, 2017, to file/serve her reply brief, i.e., to extend the deadline through next Thursday, November 23, 2017, by the undersigned's calculations.<sup>2</sup>

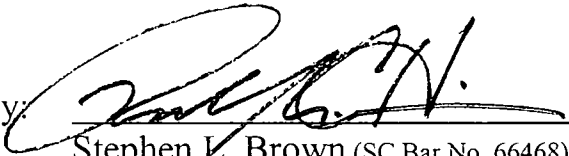
**<SIGNED ON THE FOLLOWING PAGE>**

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<sup>1</sup> In pertinent part, the Court's July 16, 2014 order provides, "Upon a showing of good cause, a party (or multiple parties if represented by the same counsel) may be granted extensions totaling no more than twenty (20) days during the proceedings before this Court. If multiple extensions are taken within the twenty (20) day cumulative limit, the minimum period that can be requested is five (5) days." Thus far, Dr. Roane has been granted three (3) extensions of five (5) days each, specifically a five-day extension of time to file/serve her petition for a writ of certiorari (granted by order of September 22, 2016) and two five-day extensions of time to file/serve her reply to Respondents' return to her petition (granted by orders of November 14 and 15, 2016, respectively).

<sup>2</sup> Computing time pursuant to Rule 263(a), because the period of time involved, five (5) days, "is less than seven (7) days, intermediate Saturdays, Sundays and holidays [are to] be excluded in the computation." Excluding Saturday the 18<sup>th</sup> and Sunday the 19<sup>th</sup> from the computation, the five-day period (beginning today, Thursday, November 16<sup>th</sup>) runs through Thursday, November 23<sup>rd</sup>.

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James E. Scott, IV (SC Bar No. 09063)  
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*Counsel for Petitioners  
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Rheumatology Associates, P.A.*

Charleston, South Carolina

Dated: 11/16/17

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Petitioners.

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**PROOF OF SERVICE**

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**S.C. SUPREME COURT**

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondents Georgia Roane, M.D., and Rheumatology Associates, P.A., do hereby certify that I have served the **MOTION OF PETITIONERS GEORGIA ROANE, M.D., AND RHEUMATOLOGY ASSOCIATES, P.A., FOR EXTENSION OF TIME TO FILE/SERVE REPLY BRIEF** on all other parties of record by depositing a copy of the same in the United States Mail, postage prepaid, on November 16, 2017, addressed as follows to their counsel of record:

Blake A. Hewitt, Esquire  
Bluestein Thompson Sullivan  
P.O. Box 7965  
Columbia, SC 29202

*-and-*

J. Edward Bell, III, Esquire  
Bell Legal Group, LLC  
P.O. Box 2590  
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*-and-*

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Virginia L. Marshall and Todd W. Marshall*

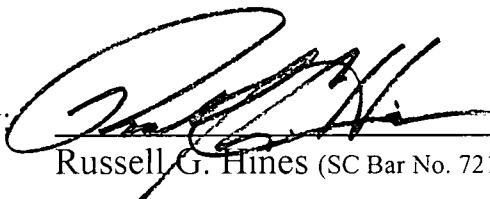
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Kenneth A. Dodds, M.D.*

Respectfully submitted,  
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By:   
\_\_\_\_\_

Russell G. Hines (SC Bar No. 72100)

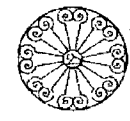
*Counsel for Respondents  
Georgia Roane, M.D., and  
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Charleston, South Carolina

Dated: 11/16/17

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