

**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
JUN 21 2019
SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

**MOTION FOR FINAL EXTENSION OF TIME, UNTIL JUNE 28, 2019,
TO FILE/SERVE INTIAL BRIEF OF RESPONDENTS**

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

NOW COMES Respondents above named, by and through their undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, hereby move this Honorable Court to allow them one final extension, until Thursday, June 28, 2019, to file/serve their initial brief and designation of matter to be included in the record on appeal.

1. By order of June 3, 2019, the Court granted Respondents' second motion for an extension of their initial briefing/designation of matter deadline, establishing a deadline of Thursday, June 21, 2019.

2. Respondents' counsel recognizes the notice in the Court's June 3, 2019 order that further extension of the initial briefing/designation deadline would have to be occasioned by extraordinary circumstances.

3. The present June 21st deadline falls during the first week in which the primary author of Respondents' reply brief (Mr. Hines) has returned to the office from a family vacation.

4. Mr. Hines had hoped to be able to complete the brief so that it would be filed/served by today, Friday, June 21, 2019, but on account of work-related and other time commitments (including childcare issues) he was unable to do so, and he humbly asks that the Court consider the circumstances (disruption to his normal work schedule) as sufficiently out of the ordinary to merit granting the

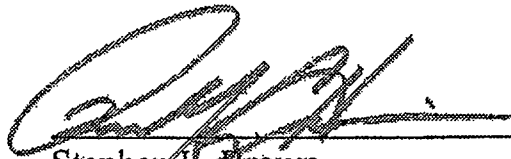
dispensation requested herein, which he most respectfully submits is consistent with the interests of justice and will not unduly prejudice any other party.

WHEREFORE, Respondents respectfully requests that this Honorable Court allow them through Friday, June 28, 2019, to file/serve their initial brief and designation of matter to be included in the record on appeal. Further, Respondents respectfully requests that the Court hold this 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: 6/21/19

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PROOF OF SERVICE

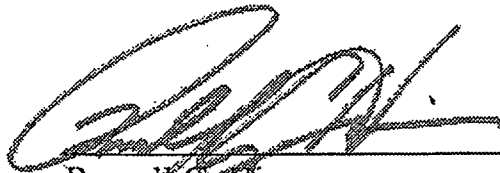
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Stephen L. Brown
Joseph J. Tierney, Jr.
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Charleston, South Carolina 29402
(843) 720-5488
Attorneys for Respondents

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **MOTION FOR FINAL EXTENSION OF TIME, UNTIL JUNE 28, 2019, TO FILE/SERVE INTIAL BRIEF OF RESPONDENTS** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on June 21, 2019, addressed as follows:

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

YOUNG CLEMENT RIVERS, LLP

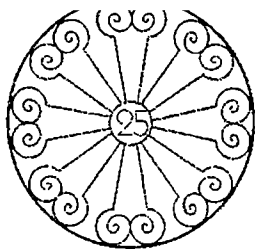
By:



Russell G. Hines
Attorneys for Respondents

Charleston, South Carolina

Dated: 6/21/19



YCR LAW

Young Clement Rivers, LLP

All Business, Insurance, Real Estate and Regulatory Matters
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THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY

To: 18037341839
From: kbarnes@ycrlaw.com
Date: June 21, 12:59:31 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. 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.

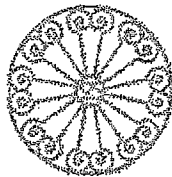
Thanks so much!

Katy B. Barnes
Commercial Litigation Secretary to
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines
YCR LAW
25 Calhoun Street, Suite 400
Charleston, SC 29401
Phone: (843) 724-6610
Fax: (843) 579-1369

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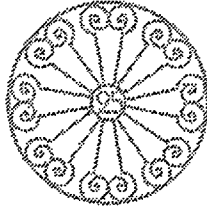
SC Court of Appeals



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Kathleen B. Barnes
Secretary

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E-mail: kbarnes@ycrlaw.com

June 21, 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 Motion for Final Extension of Time Until June 28, 2019, to File/Serve Initial Brief of Respondents 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