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**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

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

RECEIVED
JUN 24 2019
SC Court of Appeals

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.

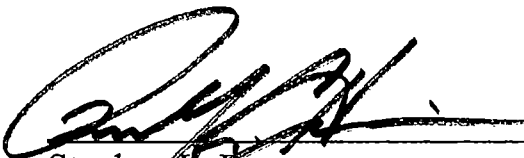
4. Mr. Hines had hoped to be able to complete the brief so that it would be filed/served by today, Friday, June 21, 2019, but on account of work-related and other time commitments (including childcare issues) he was unable to do so, and he humbly asks that the Court consider the circumstances (disruption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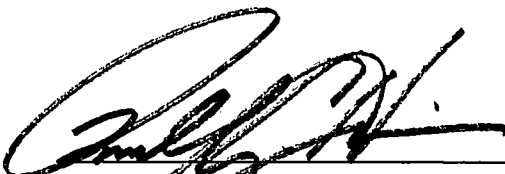
PROOF OF SERVICE

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 **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

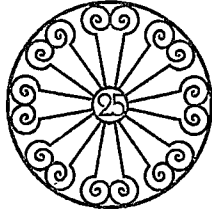
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines
Attorneys for Respondents

Charleston, South Carolina

Dated: 6/21/19



YCR LAW

Kathleen B. Barnes
Secretary

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

June 21, 2019

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

RECEIVED

JUN 24 2019

SC Court of Appeals

Enclosures

Cc: Thelma R. Garrick

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 **YCRLAW**
Young Clement Rivers, LLP
© CALHOUN STREET, SUITE 400
P.O. Box 393
CHARLESTON, SC 29402

RGH
3810-20180252

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