

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Circuit Court Judge R. Keith Kelly

Appellate Case No. 2019-00803

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OCT 01 2019

SC Court of Appeals

Fonda E. Patrick and Andre Patrick.....Appellants,  
v.  
Frank Y. Chase, M.D.....Respondent.

RESPONDENT'S MOTION FOR EXTENSION OF TIME

Respondent's counsel respectfully requests a thirty-day extension of time to file the Initial Brief in this matter due to previously scheduled matters. The current deadline is October 10, 2019, the new deadline for the Initial Brief would be November 11, 2019.

**WHEREFORE**, Respondent respectfully requests an extension of thirty days, until November 11, 2019, within which to file its initial brief.

September 30, 2018

Respectfully submitted,  
  
Hutson S. Davis, Jr., Attorney at Law  
S. Harrison Williams, Attorney at Law  
JOHNSON & DAVIS, PA  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909  
(843) 815-7121  
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harrison@jd-pa.com  
*Attorneys for Respondent,  
Frank Y. Chase, M.D.*

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PROOF OF SERVICE

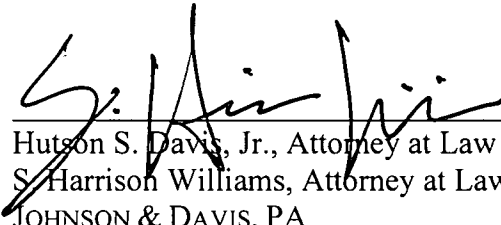
The undersigned hereby certifies that on September 30, 2019, he served counsel for Appellant and counsel for Co-Respondents with the Cover Letter and Motion for Extension of Time in this matter by mailing a copy of same by United States Mail with first class postage prepaid to the following addresses:

Francis M. Hinson, IV, Esquire  
Finkle Law Firm LLC  
P.O. Box 1799  
Columbia, SC 29202  
*Attorney for Appellants*

James Drayton, Esquire  
Nance, McCants & Massey  
218 Newberry St. SW  
Aiken, SC 29801  
*Attorney for Respondent, Dr. Bryan*

Kenneth Norman Shaw, Esquire  
J. Ben Alexander, Esquire  
Haynsworth Sinkler Boyd  
P.O. Box 2048  
Greenville, SC 29602  
*Attorneys for Respondent, Aiken Regional Medical Center, LLC*

[Signature page to follow]



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*Attorneys for Respondent,*

*Frank Y. Chase, M.D.*



JOHNSON & DAVIS, PA  
ATTORNEYS

BARRY L. JOHNSON\*\*  
HUTSON S. DAVIS, JR.\*  
S. HARRISON WILLIAMS

\*Certified SC Mediator  
\*Certified SC Arbitrator

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HARRISON@JD-PA.COM

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SC Court of Appeals

Via UPS

The Honorable Jenny Abbott Kitchings, Clerk  
South of Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Fonda E. Patrick and Andre Patrick vs. Gasnel E. Bryan, MD, Individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; Frank Y. Chase, MD, Individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; Johnathan H. Anderson, MD, Individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; and Aiken Regional Medical Centers, LLC.

C/A No.: 2018-NI-02-00003  
Appellate Case No.: 2019-000803  
J&D, PA File No.: N18-6731

Dear Ms. Kitchings:

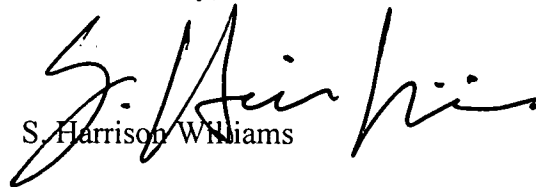
I am writing to seek a thirty-day extension for the filing of Respondent's initial brief. If granted, the new deadline for the Initial Brief would be November 11, 2019. I ask that all filing deadlines be held in abeyance pending a decision on this request for an extension.

Enclosed please find the original and one copy of Respondent's Motion for Extension, along with a Proof of Service for same. Please file the original and return the date-stamped copy to our office in the enclosed, self-addressed, stamped envelope. I am also enclosing our firm's check in the amount of \$50.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

September 30, 2019  
The Honorable Jenny Abbott Kitchings, Clerk  
South of Carolina Court of Appeals  
Page 2

Thanking you, and with best wishes, I am

Most sincerely,



S. Harrison Williams

SHW:clo

cc: Francis M. Hinson, IV, Esquire  
Kenneth Norman Shaw, Esquire  
J. Ben Alexander, Esquire  
James Drayton Nance, Esquire  
Frank Y. Chase, MD

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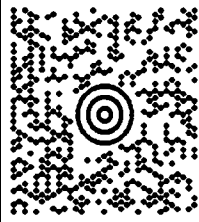
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**SHIP TO:**

MS. JENNY ABBOTT KITCHINGS, CLERK  
S.C. COURT OF APPEALS  
1220 SENATE STREET

OCT 01 2019

**COLUMBIA SC 29201 SC Court of Appeals**



**SC 292 9-01**



**UPS 2ND DAY AIR A.M.**

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BILLING: P/P

Reference #1: N18-6731



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