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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Larry B. Hyman, Circuit Court Judge

RECEIVED

Case No. 2018-CP-26-06576

OCT 09 2019

SC Court of Appeals

Cleo Bertiaux as Guardian for Kathryn G.
Parrish,

Appellant,

v.

NHC Healthcare/Garden City, LLC,

Respondent.

MOTION FOR EXTENSION

Appellant's Initial Brief is to be filed WEDNESDAY, October 9, 2019. Appellant respectfully requests a thirty (30) day extension of time in which to file and serve the Initial Brief and Designation of Matter.

The undersigned counsel for Appellant has communicated with counsel for Respondent and Respondent's counsel consents to Appellant's request for this extension.



Robert D. Dodson, Esquire
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1722 Main Street, Suite 200
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Telephone: 803-252-2600
Facsimile: 803-771-2259

Attorney for Appellants

Other Counsel for *Respondents*:

Marian W. Scalise, Esquire
Lydia McGee, Esquire
Richardson Plowden
2103 Farlow Street
Myrtle Beach, SC 29577

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PROOF OF SERVICE

I certify that I have served the Motion for Extension to File Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, addressed to the attorneys of record, Marian W. Scalise and Lydia McGee, Richardson Plowden, 2103 Farlow Street, Myrtle Beach, SC 29577.

October 9, 2019



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Attorney for Appellant

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Attorney at Law
Also Licensed in N.C.



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October 9, 2019

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Cleo Bertiaux as Guardian for Kathryn G. Parrish, Appellant v. NHC
Healthcare/Garden City, LLC, Respondent

Dear Ms. Kitchings:

Enclosed for filing is a Motion for Extension in the above case. Also enclosed are the following:

- 1) Proof of service of the Motion for Extension; and,
- 2) A filing fee of \$50.00.

Please do not hesitate to contact my office with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Malcolm', written over a circular stamp or mark.

Lisa Malcolm
Paralegal to Robert D. Dodson

cc: Marian W. Scalise, Esquire
Lydia McGee, Esquire