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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master in Equity

Case No.: 2016-CP-49-6794

RECEIVED

OCT 23 2019

SC Court of Appeals

Mathes Auto Sales, Inc.

Respondent/Appellant

v.

Otis Morris, Jr., Pro Bowl Motors, Inc., Travelers Casualty & Surety Co., of America, Inc.; Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC, Defendants, of whom Otis Moore, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC are the Appellants/Respondents.

MOTION FOR RECONSIDERATION OF THE ORDER DATED OCTOBER 15, 2019 AND REQUEST FOR CAUSE FOR AN ADDITIONAL SEVEN DAYS TO FILE AND SERVE APPELLANT'S BRIEF AND RECORD ON APPEAL FROM TODAY'S DATE OUTSIDE OF TIME.

Dixon Automotive, LLC, Gerald Scott Dixon, and Michael Tyrone Moore do hereby move this Court to allow them an additional 7 days from today's date to file Appellants' Brief and Record on Appeal outside of time.

Undersigned counsel saw the letter dated October 15 for the first time today on October 23, 2019. (See attached). Counsel respectfully requests 7 more days to file due to the following circumstances:

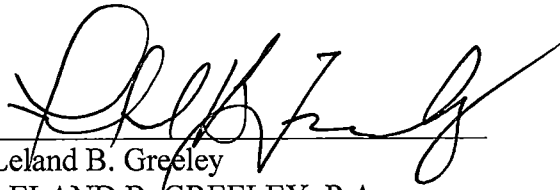
On Saturday, October 12 the undersigned suffered a heart attack.

Counsel was subsequently admitted to the Charlotte Medical Center, Pineville, North Carolina and underwent a heart procedure on Tuesday, October 15, 2019. (See attached referral from Novant Health to Sanger Heart and Vascular; as well as image

dated October 15, 2019 of counsels repaired Lateral Coronary Artery.) Counsel remained in the hospital until released home on October 13, 2019. Counsel was to remain at home until the follow-up appointment on October 21, 2019. (See attached hospital exit instructions.) On October 21, 2019 counsel was released to return to work on September 22, 2019. Counsel did return to work yesterday but saw the attached letter this morning and thus has drafted and filed this motion.

Appellants respectfully request this motion be granted.

October 23, 2019.



Leland B. Greeley
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Attorney for Appellants/Respondents Dixon,
Moore, and Dixon Automotive, LLC.

Other Counsel of Record:

J. Gregory Studemeyer
Attorney at Law
1701 Richland Street
Post Office Box 12201
Columbia, South Carolina 29211-2201
Gesquire54@gmail.com
Attorney for the Mathes Auto Sales, Inc.

H. Ronald Stanley
The Stanley Law Group
Post Office Box 7722
Columbia, South Carolina 29202
Attorney for Otis Morris, Jr., and Pro Bowl Motors.

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Referral: 20115038

Priority: Emergency

Member Information

Patient Name: Greeley, Leland B
Address: 620 Aiken Ave
Rock Hill SC 29730

DOB: 11/21/1958
Phone: 803-324-5990
803-230-7886
803-329-0088

Primary Payor: BCBS SC
ID: ZCS66238452
Grp. No. N/A
Claim Address: PO Box 100605
Columbia, SC 29260-0605

Secondary Payor: <NONE>
ID: <NONE>
Grp. No. N/A
Claim Address:

Primary Subscriber: Greeley, Sabella M
Address: 620 AIKEN AVE
ROCK HILL, SC 29730

Secondary Subscriber: N/A
Address:

Referred to Information

Provider
Provider: Nathaniel C Edwards
Specialty: Cardiology
Address: 1656 RIVERCHASE BOULEVARD
SUITE 2500
ROCK HILL SC 29732
Phone: 803-327-3456

Fax: 803-327-4320

Location
Location Sanger Heart and Vascular-Rock Hill
Dept.:
Specialty: N/A

Address: 1656 Riverchase Blvd
Suite 2500
ROCK HILL SC 29732
Phone: 803-327-3456
Fax: 704-667-3534

Referred by Information

Provider: Malcolm L Marion
Location: Novant Health Rock Hill Family Medicine
Dept.: Novant Health Rock Hill Family Medicine
Address: 1435 Ebenezer Road
Rock Hill Sc 29732-2338
Phone: 803-328-3828
Fax: 803-328-3879

Referral Information

Authorization #

Start Date: 10/14/2019

End Date: No expiration date on the referral. Visits: 1

Diagnoses:

R07.9 (ICD-10-CM) - Chest pain, unspecified type
I45.2 (ICD-10-CM) - Incomplete right bundle branch block
(RBBB) with left anterior fascicular block (LAFB)
R53.83 (ICD-10-CM) - Fatigue, unspecified type

Procedures:

AMB REFERRAL TO CARDIOLOGY [REF12]

Appointment Information

Date: 10/14/2019

Time:

Location: Sanger Heart and Vascular-Rock Hill

Send on over

Greeley, Leland Bland
0006275728
CHS
Justin Haynie, MD
CMC Pineville

Series: 1
Image: 17
Frame: 36

Oct 15, 2019
10:36 AM



20.20 CRA
21.90 LAO



Atrium Health

Care After You Leave the Hospital

Name: GREELEY, LELAND BLAND **MRN:** 0006275728 **DOB:** 11/21/1958

Allergies: No known allergies **Discharge Diagnosis:** 1:Non-ST elevation MI (NSTEMI); 2:Obesity; 3:Left carotid bruit; 4:Smoker **Discharged To:** Home

Discharged From: 3TS Cardiac Tele

Your Next Appointments

With: DIANNE BOIK **Address:** SHVI Rock Hill, 1656 River Chase Blvd, SUITE 2500 ROCK HILL, SC 29732 (803) 327-3456 Business (1) **When:** [10/21/2019 3:00 PM]

You will get a text message or phone call with appointments already made for you. If you do not get a text message or phone call, please call the doctor's office listed.

	Date	Time	Location	Provider	Phone Number
1.	10/21/19	03:00 pm	SHVI Rock Hill	Boik PA, Dianne M	803-327-3456

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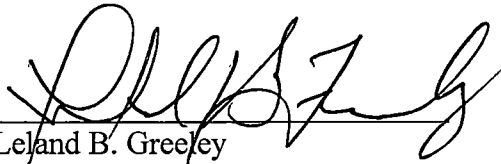
v.

Otis Morris, Jr., Pro Bowl Motors, Inc., Travelers Casualty & Surety Co., of America, Inc.; Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC, Defendants, of whom Otis Moore, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC are the Appellants/Respondents.

PROOF OF SERVICE

I certify that I served the motion to reconsider the Order of October 15, 2019 regarding the filing of the final brief and Record on Appeal on Mathes Auto Sales Inc. and Otis Morris, Jr. and Pro Bowl Motors, Inc. on October 23, 2019 by hand delivering a copy of it the attorneys of record, J. Gregory Studemeyer, 1701 Richland Street, Columbia, South Carolina 29211-2201 and H. Ronald Stanley, 1418 Park Street, Columbia, South Carolina 29202.

October 23, 2019



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Attorney for Appellants.

Other Counsel of Record:

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ATTORNEY**

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October 23, 2019

HAND DELIVERED

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

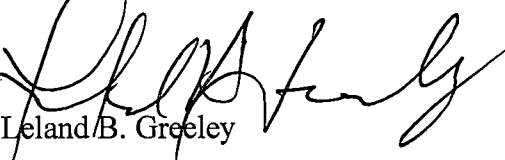
RE: Mathes Auto Sales, Inc. v. Otis Morris, Jr, et al..
22019-000297

Dear Ms. Kitchings:

Please find enclosed the original and a copy of Appellants' Dixon, Moore, and Dixon Automotive, LLC Motion to Reconsider Order and for an Additional 7 days for Cause and the motion fee of \$50.00; as well as the Proof of Service on opposing counsel.

With kindest regards, I remain

Very truly yours,


Leland B. Greeley

Enclosures

cc: J. Gregory Studemeyer; H. Ronald Stanley (Hand Delivered).

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