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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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NOV 06 2019

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
The Honorable H.W. Funderburk, Jr., Administrative Law Judge

APPELLATE CASE No.: 2019-000358
ADMINISTRATIVE LAW COURT CASE No.: 16-ALJ-07-0386-CC

Trident Medical Center, LLC, d/b/a Trident Medical Center.....Respondent,

v.

South Carolina Department of Health and Environmental Control,
and Roper St. Francis Hospital – Berkeley, Inc., d/b/a Roper
St. Francis Hospital – Berkeley.....Respondents below,

Of Which South Carolina Department of Health and Environmental
Control is a.....Respondent,

And Roper St. Francis Hospital – Berkeley, Inc., d/b/a
Roper St. Francis Hospital – Berkeley is the.....Appellant.

**APPELLANT’S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF**

James G. Long, III
Jennifer J. Hollingsworth
NEXSEN PRUET, LLC
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Attorneys for Appellant

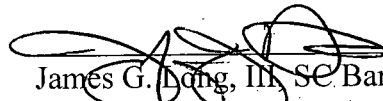
November 6, 2019

Pursuant to Rule 208(a)(3), SCACR, Appellant respectfully requests a thirty (30) day extension of time in which to file the Initial Reply Brief. Appellant's Initial Reply Brief is currently due on November 14, 2019, and the basis for this request is that Appellant is participating in a contested hearing that is scheduled to continue through November 22, 2019. Accordingly, Appellant respectfully requests this extension of time and asks that the deadline for filing be extended to and through December 14, 2019.

Counsel for Respondents have consented to this request.

Respectfully submitted,

NEXSEN PRUET, LLC



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*Attorneys for Appellant, Roper St. Francis
Hospital – Berkeley, Inc., d/b/a Roper St.
Francis Hospital – Berkeley*

November 16, 2019
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Roper St. Francis Hospital – Berkeley is the.....Appellant.

PROOF OF SERVICE

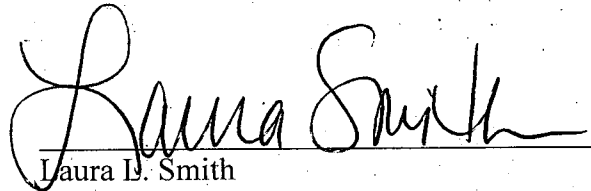
The undersigned hereby certifies that on November 6, 2019, she caused a copy of the *Appellant's Motion for Extension of Time to File Initial Reply Brief* to be served on all parties of record by electronic mail, and by placing a copy of the same in the U.S. Mail, postage prepaid thereof, addressed as follows:

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Walter H. Cartin, Esquire
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Post Office Box 1509
Columbia, SC 29202
willthomas@parkerpoe.com
waltcartin@parkerpoe.com

*Attorneys for Respondent, Trident Medical Center, LLC, d/b/a
Trident Medical Center*

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*Attorneys for Respondent SC Department of Health &
Environmental Control*



Laura D. Smith
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Post Office Drawer 2426
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Laura L. Smith
Legal Practice Assistant

November 6, 2019

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

NOV 06 2019

SC Court of Appeals

**Re: Trident Medical Center, LLC, d/b/a Trident Medical Center
vs. South Carolina Department of Health and Environmental
Control, and Roper St. Francis Hospital – Berkeley, Inc.,
d/b/a Roper St. Francis Hospital – Berkeley County
Appellate Case No.: 2019-000358**

Dear Ms. Kitchings:

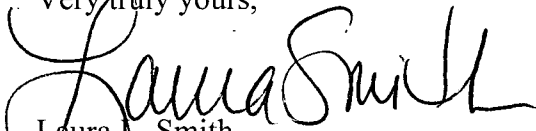
Charleston
Charlotte
Columbia
Greensboro
Greenville
Hilton Head
Myrtle Beach
Raleigh

Enclosed please find an original and one (1) copy of *Appellant's Motion for Extension of Time to File Initial Reply Brief* to be clocked and filed in the above captioned matter, together with an original and one (1) copy of the *Proof of Service*. Please file the originals and return the filed-stamped copies to me via our courier. I have also enclosed our firm's check in the amount of \$50.00 which represents the filing fee for the same.

By copy of this letter, I am hereby serving a copy of the same on opposing counsel.

With highest regards, I remain

Very truly yours,


Laura L. Smith
Legal Assistant to Jennifer J. Hollingsworth

The Honorable Jenny Abbott Kitchings
November 6, 2019
Page 2

/lls

Enclosures

cc: William R. Thomas, Esquire (*w/enclosures – via electronic & U.S. Mail*)
Walter H. Cartin, Esquire (*w/enclosures – via electronic & U.S. Mail*)
Ashley C. Biggers, Esquire (*w/enclosures – via electronic & U.S. Mail*)
Vitó M. Wicevic, Esquire (*w/enclosures – via electronic & U.S. Mail*)