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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

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NOV 06 2019

SC Court of Appeals

Larry Hyman, Circuit Court Judge

Appellate Case No. 2019-001304

Phillippa Smalling, individually and as Next Friend for
Jahmerican M., a minor

Appellant,

v.

Lisa R. Maselli, M.D., both individually and
as agent/employee of Carolina OB-GYN,


Respondents.

**MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF**

COMES NOW, the Appellants, Phillippa Smalling, individually and as Next Friend of Jahmerican M., a minor, by and through their undersigned counsel, and hereby move the Court, pursuant to Rule 224, SCACR, for a seven (7) day extension of time to file the Initial Brief of Appellants in this action. The current deadline is November 6, 2019. With the requested extension, the new deadline would be November 13, 2019.

Appellant's counsel is having technical issues with the office's internal computer system and is diligently trying to get them resolved. Counsel has contacted counsel for Respondent who has not indicated at the time of this filing whether or not he objects to the extension.

WHEREFORE, Appellant respectfully requests until **November 13, 2019** in which to file the Initial Brief in this action.



Edward L. Graham
GRAHAM LAW FIRM, P.A.
33 Market Point Drive
Greenville, SC 296607
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Attorneys for Appellant

November 6, 2019

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to file Initial Brief on Lisa R. Maselli, M.D., both individually and as agent/employee of Carolina OB-GYN by electronic mail and by depositing a copy of it in the United States Mail, postage prepaid, on November 6, 2019, addressed to their attorneys of record, Other Counsel of Record: James B. Hood and John O. Radeck, Jr., HOOD LAW FIRM, LLC, Post Office Box 1508, Charleston, SC 29402


Edward L. Graham
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33 Market Point Drive
Greenville, SC 296607
egraham@grahamlawfirm.net
Attorneys for Appellant

November 6, 2019



GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham, Esq.

November 6, 2019

VIA HAND DELIVERY

Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RE: Notice of Appeal
Case No. 2016-CP-2200863
Appeal from Georgetown County

RECEIVED

NOV 06 2019

Dear Clerk,

I have enclosed the following for docketing:

SC Court of Appeals

1. Motion for Extension of Time
2. Certificate of Mailing
3. Filing fee of \$50.00

Please clock a copy of the Notice and return it to me in the enclosed envelope.

Sincerely,

Edward L. Graham, Esq.
Graham Law Firm
33 Market Point Drive
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Attorneys for Appellant

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