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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

APPELLATE CASE No.: 2019-001159
ADMINISTRATIVE LAW COURT CASE No.: 18-ALJ-07-0100-CC

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

v.

South Carolina Department of Health and Environmental Control,
and Medical University Hospital Authority d/b/a MUSC Radiation
Therapy Center – Berkeley County,.....Respondents,

Of which, Medical University Hospital Authority d/b/a
MUSC Radiation Therapy Center – Berkeley County is the.....Appellant.

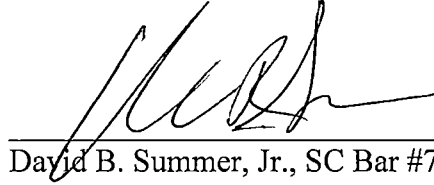
**RESPONDENT TRIDENT MEDICAL CENTER, LLC'S
MOTION FOR A SECOND EXTENSION OF TIME TO FILE AND SERVE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE
INCLUDED IN THE RECORD ON APPEAL**

Respondent Trident Medical Center, LLC, d/b/a Trident Medical Center ("Trident"), pursuant to Rules 240 and 263(b), SCACR, respectfully requests a thirty (30) day extension of time in which to file Respondent's Initial Brief and Designation of Matters to be included in the Record on Appeal. In support of its motion, Respondent states that pursuant to the Order of the Court dated November 4, 2019, Respondent was granted until December 13, 2019 to file its Initial Brief and Designation of Matters to be Included in the Record on Appeal. The undersigned counsel requests this second

extension due to Respondent's counsel just completing a three-week long trial before the South Carolina Administrative Law Court, which began on October 30, 2019 and ended on November 21, 2019, as well as counsel's upcoming vacation schedules and the upcoming holidays. Respondent respectfully requests that the deadline for filing the Initial Brief and Designation be extended for thirty (30) days until Monday, January 13, 2020.

Respondent has consulted with all parties of record and obtained their consent to this motion for extension.

Respectfully submitted,



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William R. Thomas, SC Bar #16348
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*Attorneys for Respondent
Trident Medical Center, LLC d/b/a
Trident Medical Center*

November 25, 2019
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
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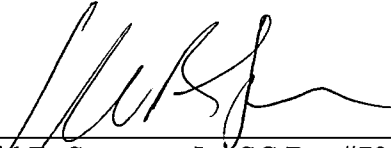
Of which, Medical University Hospital Authority d/b/a
MUSC Radiation Therapy Center – Berkeley County is the.....Appellant.

PROOF OF SERVICE

I certify that, on November 25, 2019, I served **RESPONDENT TRIDENT MEDICAL CENTER, LLC'S MOTION FOR A SECOND EXTENSION OF TIME TO FILE AND SERVE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL** on all parties of record by hand delivering a copy of same, addressed as follows:

Ashley C. Biggers, Esquire
Vito Wicevic, Esquire
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Daniel J. Westbrook, Esquire
Travis Dayhuff, Esquire
A. Mattison Bogan, Esquire
William C. Wood, Jr., Esquire
Nelson Mullins Riley & Scarborough, LLP
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Columbia, SC 29201



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Atlanta, GA
Charleston, SC
Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC
Washington, DC

November 25, 2019

VIA HAND DELIVERY

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

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SC Court of Appeals


**Re: Trident Medical Center, LLC, d/b/a Trident Medical Center vs. South Carolina Department of Health and Environmental Control, Medical University Hospital Authority d/b/a MUSC Radiation Therapy Center – Berkeley County
Appellate Case No.: 2019-001159**

Dear Ms. Kitchings:

Enclosed please find an original and six copies of Respondent Trident Medical Center, LLC's Motion for Second Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record in the above-referenced appeal. I have also enclosed our Firm's check in the amount of \$50.00 in satisfaction of the Court's filing fee.

By copy of this letter and as evidenced by the Proof of Service filed herewith, I am serving a copy of the Motion on counsel of record.

Sincerely,



William R. Thomas

WRT:vm
Enclosures

cc: Ashley C. Biggers, Esquire (*w/ encl. via hand-delivery*)
Vito Wicevic, Esquire (*w/encl. via hand-delivery*)
Daniel J. Westbrook, Esquire (*w/ encl. via hand-delivery*)
Travis Dayhuff, Esquire (*w/ encl. via hand-delivery*)
A. Mattison Bogan, Esquire (*w/ encl. via hand-delivery*)
William C. Wood, Jr., Esquire (*w/ encl. via hand-delivery*)

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