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STATE OF SOUTH CAROLINA  
in The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
DEADRA L. JEFFERSON, Circuit Court Judge

**RECEIVED**

DEC 19 2019

SC Court of Appeals

Case No. 2015-CP-10-5000  
Appellate Case No. 2019-000640

Jim Washington,.....Appellant,

v.

Trident Medical Center, LLC.....Respondent.

**MOTION FOR EXTENDING THE TIME TO FILE OUT OF TIME RECORD ON APPEAL WITH MOTION FOR LEAVE OF THE COURT TO CONSOLIDATE PETITION FOR SUPERSEDEAS/STAY WITH APPEAL AND USE SUPERSEDEAS/STAY RECORDS AS THE RECORD ON APPEAL SUPPLEMENTED/SUBSTITUTED RECORD ON APPEAL WITHOUT PREJUDICE TO PARTIES.**

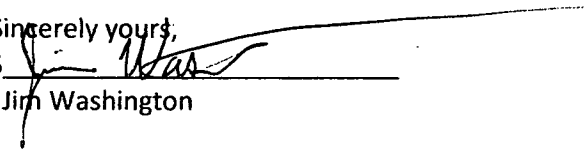
Appellant, do hereby request in this motion an extension of time to file the record on appeal out of time under SCACR Rule 263(b) due to unforeseen developments in this case. Appellant, further seeks leave of this Court to consolidate the appeal with the petitions for supersedeas/stay because the matters are related and have been incorporated by reference by the parties in petitions for supersedeas/stay and should be use as the record on appeal substituted/supplemented under SCACR Rules 214 and 212(b). A copy have been served on all counsel of record. The initial supersedeas/stay number shall remain as they are but will be updated to include the new page numbers of the subsequent petitions filed which will be consecutive in numbers starting with the last page number of the initial petition. All subsequent petition will be numbered consecutively based on the dates they were filed. This will be accomplished by Appellant serving an attached sheet in this motion consecutive in numbers of the subsequent petitions filed in this Court. Should these request be

accepted by this Court the estimated due date would be December 19, 2019. Please feel free to contact Appellant if there any questions.

With best regards, I remain

Sincerely yours,

S

  
Jim Washington

JW/jw

Enclosure

cc: Blake T. Williams, Esquire  
David H. Batten, Esquire

December 9, 2019

**RECORD ON APPEAL ATTACHMENT**

Petition for Supersedeas/Stay, filed on 10/28/19.....pp. 1-224

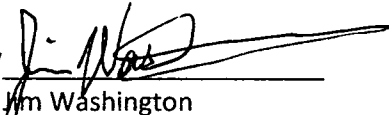
Request to Reply to Respondent Response in Opposition to Supersedeas/Stay, pp. 225-242

Request to Petition the Full Appellate Court for Supersedeas/Stay.....pp. 243-265

Request to rehear/clarify and correct order denying Supersedeas/Stay, filed on 12/19/19....pp.266-280

The undersigned hereby certifies that the Record on Appeal contains all material/proposed to be included by any of the parties and not any other material.

December 18, 2019

S/   
Jim Washington  
209 Signet Drive  
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WTS Transport, LLC@yahoo.com  
803-496-4655  
Appellant, Pro Se

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**PROOF OF SERVICE**

I, the undersigned, do hereby certify that I have I have served all counsel in this action with a copy request to file motion for extension of time out of time to file record on appeal with motion for leave to consolidate petition for supersedeas/stay with appeal and to be use as record on appeal supplemented/substituted herein below specified by mailing a copy of the same by UNITED STATES MAIL postage prepaid, to the following addresses:

s/   
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Eutawville, S.C. 29048  
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Appellant, Pro Se

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