

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM Horry COUNTY
COURT OF COMMON PLEAS
THE HONORABLE LARRY B. HYMAN, JR.
CIRCUIT COURT JUDGE

RECEIVED

JAN 09 2020

SC Court of Appeals

APPELLATE CASE NO. 2019-001185
CIVIL ACTION NO. 2018-CP-26-06576

Cleo Bertiaux as Guardian for Kathryn G. Parrish,

APPELLANT,

versus

NHC Healthcare/Garden City, LLC,

RESPONDENT.

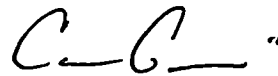
MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondent, NHC Healthcare/Garden City, LLC, and Designation of Matter to be Included in the Record on Appeal were originally due on December 9, 2019. At the Respondent's request, the Court granted a 30-day extension of time, until January 8, 2020, to serve and file the Respondent's Initial Brief and Designation of Matter. The Respondent, NHC Healthcare/Garden City, LLC, respectfully requests the Court to grant a second extension of 30 days, or until Friday, February 7, 2020, to serve and file its Initial Brief of Respondent and Designation of Matter.

Counsel for the Respondent requests a second extension due to her current workload and holiday vacation.

Counsel for the Respondent has contacted the Appellant's counsel and he consents to this request as indicated in the attached document.

Accordingly, the Respondent, NHC Healthcare/Garden City, LLC, respectfully requests an additional 30-day extension of time in which to serve and file its Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.



Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400

Marian W. Scalise
Lydia L. Magee
RICHARDSON, PLOWDEN & ROBINSON, PA
2103 Farlow Street (29577)
Post Office Drawer 3646
Myrtle Beach, South Carolina 29578
(843) 448-1008
**ATTORNEYS FOR RESPONDENT
NHC HEALTHCARE/GARDEN CITY,
LLC**

January 8, 2020.

EXHIBIT "A"

Carmen Ganjehsani

From: Robert Dodson <rdodson@rdodsonlaw.com>
Sent: Tuesday, January 07, 2020 10:31 AM
To: Carmen Ganjehsani
Subject: RE: Parrish et. al. v. NHC et. al. 2018-CP-23-06576

I consent.

Robert D. Dodson, Esquire
Law Offices of Robert Dodson, P.A.
1722 Main Street, STE 200
Columbia, SC 29201
803-252-2600

From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Tuesday, January 7, 2020 9:34:49 AM
To: Robert Dodson <rdodson@rdodsonlaw.com>
Subject: RE: Parrish et. al. v. NHC et. al. 2018-CP-23-06576

My Initial Respondent's Brief and Designation of Matter is due tomorrow, January 8, 2020. I plan to request one additional 30-day extension and would like to know if I have your consent.

Thank you,
Carmen Ganjehsani

From: Robert Dodson [<mailto:rdodson@rdodsonlaw.com>]
Sent: Wednesday, October 09, 2019 8:40 AM
To: Carmen Ganjehsani; Marian Scalise
Cc: Lisa Malcolm
Subject: RE: Parrish et. al. v. NHC et. al. 2018-CP-23-06576

I plan to ask the court of appeals of a 30 day extension to file Appellant's initial brief. I would appreciate your consent to this motion/time extension.

Thank you.

Robert D. Dodson, Esquire
Law Offices of Robert Dodson, P.A.
1722 Main Street, STE 200
Columbia, SC 29201
803-252-2600

From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Wednesday, September 11, 2019 11:04:23 AM
To: Robert Dodson <rdodson@rdodsonlaw.com>
Subject: RE: Parrish et. al. v. NHC et. al. 2018-CP-23-06576

CERTIFICATE OF SERVICE

I, the undersigned, attorney Respondent NHC Healthcare/Garden City, LLC, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated January 8, 2020, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Robert D. Dodson
Law Offices of Robert Dodson, P.A.
1722 Main Street, Suite 200
Columbia, SC 29201
Attorney for Appellant



Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR RESPONDENT
NHC HEALTHCARE/GARDEN CITY, LLC**

Dated: January 8, 2020.

RECEIVED
JAN 09 2020
SC Court of Appeals

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

January 8, 2020

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JAN 09 2020

SC Court of Appeals

Re: *Cleo Bertiaux as Guardian for Kathryn G. Parrish v.
NHC Healthcare/Garden City, LLC*
Appellate Case No.: 2019-0001185
RPR File No.: 5622-61

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Respondent's Motion for Extension of Time to file the Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$50.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on counsel for the Appellant.

If you should have any questions, please do not hesitate to contact me.

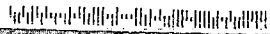
Sincerely,



Carmen V. Ganjehsani

Encs.

cc: Robert D. Dodson
Marian W. Scalise (FYI)
Lydia M. Magee (FYI)



Hasler
01/08/2020
FIRST-CLASS MAIL
US POSTAGE \$001.90⁰

ZIP 29201
011E11684119

5622-6el

RICHARDSON
PLOWDEN
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

RECEIVED

JAN 08 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211