

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Bentley D. Price
Circuit Court Judge

Appellate Case No. 2019-001716

Jeane Whitfield, Appellant,

v.

Dennis K. Shimpf, M.D. and Sweetgrass Plastic Surgery, LLC,
and

Patrick O'Neil, M.D. and O'Neil Plastic Surgery, Respondents.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Jeane Whitfield (“Appellant”) respectfully requests a thirty (30) day extension of time to file the Initial Brief of Appellant and Designation of Matter in the above-captioned appeal.

This request is necessitated due to the extraordinary circumstances resulting from the current Coronavirus (Covid-19) state of emergency, which has caused unforeseeable and unprecedented interruptions to counsel’s practice.

Pursuant to the March 20, 2020 Order of the Supreme Court re: Operation of Appellate Courts During the Coronavirus Emergency, Appellant’s Initial Brief and Designation of Matter are currently due on April 27, 2020. If the request is granted, Appellant’s new due date would be May 27, 2020. Accordingly, Appellant respectfully requests that this Court enter an Order extending the

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deadline for the Initial Brief of Appellant and Designation of Matter until May 27, 2020. Appellant further requests that the current deadline be held in abeyance while the Court considers this request.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)
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and

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Attorneys for Appellant

Charleston, South Carolina
April 15, 2020

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PROOF OF SERVICE

I, the undersigned, certify that I have served the *Motion for Extension of Time* on Respondents Dennis K. Shimpf, M.D. and Sweetgrass Plastic Surgery, LLC, by emailing a copy on April 15, 2020, addressed to their attorneys of record at the following email addresses: Todd Smyth, Esq. (tsmyth@smythwhitley.com), Joshua S. Whitley, Esq., (jwhitley@smythwhitley.com), Kevin Horton, Esq., (khorton@smythwhitley.com).

I have also served this same Motion for Extension of Time on Respondents Patrick O'Neill, M.D. and O'Neill Plastic Surgery, on this same date and in the same manner as described above, addressed to their attorneys of record at the following address: Barbara W. Showers, Esq. (bwshowers@gmail.com), Maryrose L. Pritchard, Esq. (maryrose.pritchard@hoodlaw.com), Julia A. Bradshaw, Esq. (julia.bradshaw@hoodlaw.com), John O. Radeck, Jr., Esq.

(john.radeck@hoodlaw.com).

Pursuant to the March 20, 2020 Order of the Supreme Court, a copy of the aforementioned email correspondence is attached.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

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Charleston, South Carolina
April 15, 2020

From: Jesse Sanchez jesse@jessesanchezlaw.com 
Subject: Jeane Whitfield, Appellant v. Dennis K. Shimpf, M.D. and Sweetgrass Plastic Surgery, LLC, and Patrick O'Neil, M.D. and O'Neil Plastic Surgery, Respondents, Appellate Case No. 2019-001716

JS

Date: April 15, 2020 at 3:11 PM

To: Todd Smyth tsmyth@smythwhitley.com, jwhitley@smythwhitley.com, khorton@smythwhitley.com, bwshowers@gmail.com, maryrose.pritchard@hoodlaw.com, julia.bradshaw@hoodlaw.com, john.radeck@hoodlaw.com

Cc: Dan dan@slotchiverlaw.com, Andrew J. McCumber andrew@slotchiverlaw.com, Brent Halversen Brent@halversenlaw.com

Counsel,

Attached for service, please find the Cover Letter and Motion for Extension of Time that is being filed momentarily with the Court of Appeals today via OneDrive electronic submission.

Regards,

Jesse

--

Jesse Sanchez
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VIA ONE DRIVE ELECTRONIC SUBMISSION

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Jeane Whitfield, Appellant v. Dennis K. Shimpf, M.D. and Sweetgrass Plastic Surgery, LLC, and Patrick O'Neil, M.D. and O'Neil Plastic Surgery, Respondents, Appellate Case No. 2019-001716

Dear Ms. Kitchings:

Enclosed herewith please find *Appellant's Motion for Extension of Time* and corresponding *Proof of Service*.

Thank you for your assistance with this matter. Should you have any questions or wish to discuss the request, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez

Enclosures (as stated)

Cc (Via Email Only): Daniel S. Slotchiver, Esquire
Andrew J. McCumber, Esquire
Brent S. Halversen, Esquire
Todd Smyth, Esquire
Joshua S. Whitley, Esquire
Kevin Horton, Esquire
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Maryrose L. Pritchard, Esquire
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Sincerely,

s/Jesse Sanchez

Jesse Sanchez

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