

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

RECEIVED

May 27 2020

Appellate Case No. 2019-001716

SC Court of Appeals

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 ten (10) 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. In addition, this request is necessitated due to post-hospitalization care required for the undersigned counsel’s infant child. A ten day extension of time will serve the interests of justice by allowing counsel adequate time to complete the brief in this matter despite the above circumstances. Appellant does not request this extension for the impermissible purpose of delay.

Appellant's Initial Brief and Designation of Matter are currently due on May 27, 2020. If the request is granted, Appellant's new due date would be June 8, 2020. In light of the above extraordinary circumstances, Appellant respectfully requests that this Court enter an Order extending the deadline for the Initial Brief of Appellant and Designation of Matter until Monday, June 8, 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)

The Law Office of Jesse Sanchez, LLC

98 ½ Broad Street, Suite B

Charleston, South Carolina 29401

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jesse@jessesanchezlaw.com

Attorney for Appellant

Charleston, South Carolina
May 27, 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 May 27, 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

Jesse Sanchez (SC Bar No. 101906)

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Charleston, South Carolina 29401


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jesse@jessesanchezlaw.com

Charleston, South Carolina

May 27, 2020

From: Jesse Sanchez jesse@jessesanchezlaw.com 
Subject: Jeane Whitfield, Appellant v. Dennis K. Shimpf, M.D. and Sweetgrass Plastic Surgery, LLC, Case No. 2017-CP-10-2758
Date: May 27, 2020 at 7:34 AM

JS

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, Brent Halversen Brent@halversenlaw.com, Andrew J. McCumber andrew@slotchiverlaw.com, Susan Maulden paralegal@slotchiverlaw.com

Counsel,

Attached for service, please find the Cover Letter and Motion for Extension of Time, requesting a ten (10) day extension, that is being filed momentarily with the Court of Appeals today via OneDrive electronic submission.

Regards,

Jesse

--

Jesse Sanchez
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May 27, 2020

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*, requesting a ten-day extension, 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
Barbara W. Showers, Esquire
Maryrose L. Pritchard, Esquire
Julia A. Bradshaw, Esquire
John O. Radeck, Jr., Esquire

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Jeane Whitfield
Motion...20.pdf



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Sincerely,

s/Jesse Sanchez

Jesse Sanchez

Enclosures (as stated)

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