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June 17, 2020

VIA ELECTRONIC MAIL and HAND DELIVERY

The Honorable Daniel E. Shearouse

Clerk of Court

South Carolina Supreme Court

Post Office Box 11330

Columbia, South Carolina 29211

RECEIVED

JUN 17 2020

S.C. SUPREME COURT

**Re: Rajinder Parmar vs. Balbir S. Minhas, Midlands Gastroenterology and
Midlands Endoscopy Center, LLC
Appellate Case No.: 2017-000994
Unpublished Opinion No.: 2019-UP-331
Our File No.: 7-2797.100**

Dear Mr. Shearouse:

Today I received the attached letter in the mail requesting an extension of time to file a Reply Brief to Respondent's Return to Petitioners' Petition for Writ of Certiorari. The Return was filed on May 14. My reading of the Appellate Court Rules provided Petitioner 10 days to file a Reply, or May 24. If my reading is correct, counsel for Petitioner mistakenly represents that any reply brief was due June 15 and requests an extension to June 25. I acknowledge that throughout this appellate process, I have occasionally requested extensions to briefing deadlines and am generally sympathetic to any request by opposing counsel for extensions to deadlines. However, Petitioners, in this case, have sought extensions at every stage of this process and in many cases multiple extensions for single briefing deadlines. See attached letter to Court of Appeals. Based on my understanding that the deadline for filing a reply to the Return has already passed and based on the fact that the disposition of this matter has been repeatedly delayed at the request of the Petitioner, I respectfully request that the request for extension be denied and the Court proceed to rule on the Petition for Certiorari based on the briefing submitted by the parties.

The Honorable Daniel E. Shearouse
June 17, 2020
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Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

With my kindest regards, I am

Sincerely yours,

A handwritten signature in black ink, appearing to read "E. Wade Mullins III". The signature is written in a cursive style with a large, stylized "M" and "I".

E. Wade Mullins III

Enclosures

cc: Robert Widener, Esquire (Via Electronic Mail; U.S. Postal Mail)
Rajinder Parmar (Via Electronic Mail)

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June 15, 2020

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

**Re: Rajinder Parmar -v- Balbir S. Minhas, Midlands Gastroenterology, PC, and
Midlands Endoscopy Center, LLC
Appellate Case No.: 2017-000994**

Dear Mr. Shearouse:

The Petitioner's Reply is currently due June 15, 2020. Due to conflicts in undersigned counsel's schedule, Petitioner respectfully requests a ten (10) day extension to serve and file his Reply, making it due on or before June 25, 2020. This is Petitioner's first extension request for the Reply.

By copy of this letter, we are serving our request on the Respondent's counsel. Please stamp and return the enclosed copy of this request in the enclosed, self-addressed, and self-stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

Burr Forman McNair

Robert L. Widener (BY VH WITH PERMISSION)

Robert L. Widener
Partner

RLW/vh
Enclosure

The Honorable Daniel E. Shearouse

June 15, 2020

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cc: Honorable Jenny Abbott Kitchings
Edward Wade Mullins III

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AUTHOR'S E-MAIL: WMULLINS@BRUNERPOWELL.COM

October 24, 2019

VIA HAND DELIVERY

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

**Re: Rajinder Parmar vs. Balbir S. Minhas, Midlands Gastroenterology and
Midlands Endoscopy Center, LLC
Appellate Case No.: 2017-000994
Unpublished Opinion No.: 2019-UP-331
Our File No.: 7-2797.100**

Dear Ms. Kitchings:

While I am certainly mindful of scheduling conflicts and am respectful of whatever difficulties Mr. Widener may have, Respondent must object to any requests for extensions made by Appellants in this case. My client, Respondent Parmar, has been forced to endure delay after delay in this appeal. The following sets forth a timeline of the extensions requested by Appellants in this case:

- April 24, 2017- Notice of Appeal filed
- September 5, 2017- Appellants requested 30-day extension to file Initial Brief
- October 4, 2017 – Appellants' counsel withdrew and requested Appellants be granted 60 days to obtain substitute counsel
- December 18, 2017- Appellants' counsel requested Appellants' Initial Brief deadline be extended.
- January 25, 2018 – Appellants' counsel filed a Motion for Extension of Time to file Appellants' Initial Brief requesting an additional 43-day extension due to a health emergency
- March 26, 2018 – Appellants' counsel filed a Second Motion for Extension of Time to file Appellants' Initial Brief due to more health complications
- June 4, 2018 – Appellants' counsel filed a Motion for Extension of Time to file Appellants' Initial Reply Brief

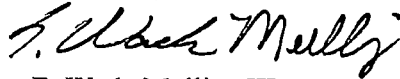
The Honorable Jenny Abbott Kitchings
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- October 24, 2019 – Appellants’ counsel requested a 15-day extension to serve and file Appellants’ Petition for Rehearing due to conflicts of schedule.

I am aware that there have been certain circumstances in this case that have justified delay. However, Respondent requests that the Court take into account the history of delays in this case when considering this or any additional requests for extensions that may be made. Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

With my kindest regards, I am

Sincerely yours,



E. Wade Mullins III

Enclosures

cc: Robert Widener, Esquire (Via Hand Delivery)
Rajinder Parmar

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