

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

Assistive Technology Medical Equipment Services, LLC,  
Respondent,

v.

Hood & Selander CPAS, LLC; Donna C. Cash, as  
Personal Representative of the Estate of Dorothy A.  
Connelly; W.E. Applegate, III, as Personal  
Representative of the Estate of James B. Connelly,  
Kimberly Cuce; and Phillip DeClemente, Defendants,

Of whom Phillip DeClemente is the Appellant.

Appellate Case No. 2018-000460

**RECEIVED**  
**Aug 12 2020**  
**SC Court of Appeals**

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Appeal From Charleston County  
J.C. Nicholson, Jr., Circuit Court Judge  
Deadra L. Jefferson, Circuit Court Judge

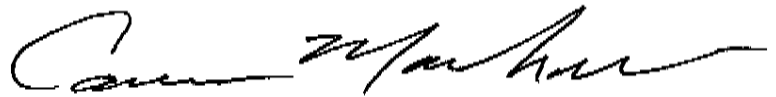
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**MOTION FOR EXTENSION OF TIME**

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The COVID-19 virus and office staffing issues necessitate this motion for extension of time in which to file Appellant's Petition For Rehearing (SCACR 221) of the Court's decision, issued July 29, 2020. Appellant and counsel therefore respectfully request an additional 30 days in which to submit their petition and supporting memorandum. The current filing deadline is August 13, 2020. This is Appellant's first request for an extension of this filing deadline.

August 12, 2020



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*Attorney for Appellant*

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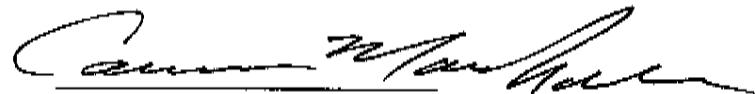
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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below he served counsel for Respondent Assistive Technology Medical Equipment Services, LLC, James E. Smith, Jr. with a copy of the *Motion for Extension* by emailing the same to the following address:

James E. Smith, Jr.  
1422 Laurel Street  
Columbia, SC 29201  
james@jamesmithpa.com

August 12, 2020



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*Attorney for Appellant*



August 12, 2020

**VIA FACSIMILE ONLY**

Honorable Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

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**Aug 12 2020**

**SC Court of Appeals**

RE:           Assistive Technology Medical v. Phillip Declemente  
              Case No. 2018-000460

Dear Ms. Kitchings,

Herewith please find Appellant's Motion for Extension of Time in reference to the above matter, along with proof of email service of this document on opposing counsel.

Thank you for your assistance in this matter.

Respectfully,

Cameron L. Marshall

Enclosures as stated

cc:   James E. Smith, Jr., P.A.  
      1422 Laurel Street  
      Columbia, SC 29201  
      By Email to:  
      james@jamesmithpa.com