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ATTORNEYS AND COUNSELORS AT LAW

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August 21, 2020

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AUG 24 2020

SC Court of Appeals

Via U.S. Mail

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

RE: CareAlliance Health Services, et al vs. South Carolina Department of Health and Environmental Control and Medical University Hospital Authority, d/b/a MUSC Health Emergency Services
Docket No. 17-ALJ-07-0444-CC

Trident Medical Center, LLC, et al vs. South Carolina Department of Health and Environmental Control and Medical University Hospital Authority, d/b/a MUSC Health Emergency Services
Docket No. 17-ALJ-07-0441
Our File No. 019243/01525

Dear Ms. Kitchings:

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Appellant Medical University Hospital Authority d/b/a MUSC Health Emergency Services ("MUSC") respectfully requests a thirty (30) day extension of time to file its Initial Appellant's Brief and Designation of Matter.

Undersigned counsel seeks this extension because of other existing and intervening court deadlines in the Fourth Circuit. This is the first requested extension of time by Appellant in this appeal. Undersigned counsel has communicated with counsel of record for the other parties to this action, and they consent to this extension request. (See attached emails re: consent.)

The current due date for Appellant's Initial Brief and Designation of Matters is August 31, 2020. With the thirty-day extension, Appellant's initial brief and designation would be due on Wednesday, September 30, 2020.

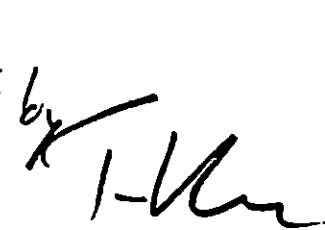
The Honorable Jenny Abbott Kitchings
August 21, 2020
Page 2

Thank you for your kind consideration of this request.

Very truly yours,

Dan Westbrook

Daniel J. Westbrook

by 

DJW:kh

cc: Ashley C. Biggers, Esq.
Vito M. Wicevic, Esq.
David B. Summer, Jr., Esq.
William R. Thomas, Esq.
Walter H. Cartin, Esq.
Amy Flanary-Smith, Esq.
Jennifer J. Hollingsworth, Esq.
Shannon V. Lipham, Esq.

Katie Hallmark

From: Biggers, Ashley <biggerac@dhec.sc.gov>
Sent: Wednesday, August 19, 2020 3:06 PM
To: jhollingsworth@nexsenpruet.com; Dan Westbrook; willthomas@parkerpoe.com
Cc: Lipham, Shannon V.; Wicevic, Vito; Summer, David B., Jr.; Cartin, Walt H.; Travis Dayhuff; Caroline Warner; Tammie Pope
Subject: Re: Trident v. SCDHEC and MUHA AND CareAlliance v. SCDHEC and MUHA, Court of Appeals case no. 2020-001072 [IWOV-NPCOL1.FID1853813]

No objection here either.

Thanks,
Ashley

Ashley C. Biggers
Chief Counsel for Healthcare Quality
S.C. Dept. of Health & Environmental Control
Office: (803) 898-3362
Mobile: (803) 354-2928
Connect: www.scdhec.gov [Facebook](#) [Twitter](#)



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From: Hollingsworth, Jennifer J. <JHollingsworth@nexsenpruet.com>
Sent: Wednesday, August 19, 2020 2:45 PM
To: dan.westbrook@nelsonmullins.com <dan.westbrook@nelsonmullins.com>; willthomas@parkerpoe.com <willthomas@parkerpoe.com>
Cc: Lipham, Shannon V. <SVLipham@nexsenpruet.com>; Biggers, Ashley <biggerac@dhec.sc.gov>; Wicevic, Vito <wicevivo@dhec.sc.gov>; Summer, David B., Jr. <davidsummer@parkerpoe.com>; Cartin, Walt H. <waltcartin@parkerpoe.com>; Travis Dayhuff <travis.dayhuff@nelsonmullins.com>; Caroline Warner <caroline.warner@nelsonmullins.com>; Tammie Pope <tammie.pope@nelsonmullins.com>
Subject: RE: Trident v. SCDHEC and MUHA AND CareAlliance v. SCDHEC and MUHA, Court of Appeals case no. 2020-001072 [IWOV-NPCOL1.FID1853813]

*** Caution. This is an EXTERNAL email. DO NOT open attachments or click links from unknown senders or unexpected email. ***

No objection here.

Take care,
Jennifer

Jennifer J. Hollingsworth

Member

Nexsen Pruet, LLC

1230 Main Street, Suite 700

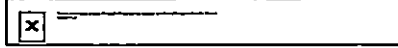
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From: Dan Westbrook <dan.westbrook@nelsonmullins.com>

Sent: Wednesday, August 19, 2020 2:38 PM

To: Thomas, William R. <willthomas@parkerpoe.com>

Cc: Hollingsworth, Jennifer J. <JHollingsworth@nexsenpruet.com>; Lipham, Shannon V. <SVLipham@nexsenpruet.com>;

Ashley Biggers <BIGGERAC@dhec.sc.gov>; Vito Wicevic <wicevism@dhec.sc.gov>; Summer, David B., Jr. <davidsummer@parkerpoe.com>;

Cartin, Walt H. <waltcartin@parkerpoe.com>; Travis Dayhuff

<travis.dayhuff@nelsonmullins.com>; Caroline Warner <caroline.warner@nelsonmullins.com>; Tammie Pope

<tammie.pope@nelsonmullins.com>

Subject: Re: Trident v. SCDHEC and MUHA AND CareAlliance v. SCDHEC and MUHA, Court of Appeals case no. 2020-001072

{EXTERNAL EMAIL}

Thanks

Sent from my iPhone

On Aug 19, 2020, at 2:31 PM, Thomas, William R. <willthomas@parkerpoe.com> wrote:

Dan,

No problem. Will

William Thomas

Partner

Find our latest health care analysis [here](#).



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From: Dan Westbrook <dan.westbrook@nelsonmullins.com>

Sent: Wednesday, August 19, 2020 2:24 PM

To: Jennifer J. Hollingsworth <JHollingsworth@nexsenpruet.com>; Shannon V. Lipham

<SVLipham@nexsenpruet.com>; Ashley Biggers <BIGGERAC@dhec.sc.gov>; Vito Wicevic <wicevism@dhec.sc.gov>; Summer, David B., Jr. <davidsummer@parkerpoe.com>; Thomas, William R. <willthomas@parkerpoe.com>; Cartin, Walt H. <waltcartin@parkerpoe.com>
Cc: Travis Dayhuff <travis.dayhuff@nelsonmullins.com>; Caroline Warner <caroline.warner@nelsonmullins.com>; Tammie Pope <tammie.pope@nelsonmullins.com>
Subject: Trident v. SCDHEC and MUHA AND CareAlliance v. SCDHEC and MUHA, Court of Appeals case no. 2020-001072

Caution: External email

Counsel, would you consent to an extension of time for us to file our initial appellate brief and designation of matter at the court of appeals in the appeal referenced above? Our current deadline is Aug. 31, 2020. I intend to request 30 additional days, making the new deadline September 30, 2020. Please let me know if you have any objection. Thank you very much for this courtesy.

Dan

Sent from my iPhone

Nelson Mullins is continuing to monitor developments related to COVID-19, including guidance from the Centers for Disease Control and various health officials; and federal, state, and local government authorities. The firm has implemented precautionary measures and plans to ensure the continuation of all firm services to clients from both in office and remote work arrangements across our 25 geographically dispersed offices. Click here to visit the Nelson Mullins Coronavirus Resources page.<<https://www.nelsonmullins.com/coronavirus-resources>> Information described therein is subject to change.

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The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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29211-162929

