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Nov 18 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
The Honorable Shirley C. Robinson, Administrative Law Judge

APPELLATE CASE No.: 2020-001072

ADMINISTRATIVE LAW COURT CASE NO.: 17-ALJ-07-0441-CC

ADMINISTRATIVE LAW COURT CASE NO.: 17-ALJ-07-0444-CC

Trident Medical Center, LLC, d/b/a Trident Medical Center  
and Summerville Medical Center,.....Petitioner/Respondent,

v.

South Carolina Department of Health and Environmental Control  
and Medical University Hospital Authority d/b/a  
MUSC Health Emergency Services,.....Respondents,

Of Which, Medical University Hospital Authority d/b/a  
MUSC Health Emergency Services is the.....Appellant.

AND

CareAlliance Health Services, d/b/a Roper St. Francis  
Healthcare, Roper Hospital, Inc., Bon Secours-St. Francis  
Xavier Hospital, Inc., Roper Mount Pleasant Hospital and  
Roper St. Francis Berkeley Hospital,.....Petitioner/Respondent,

v.

South Carolina Department of Health and Environmental Control,  
and Medical University Hospital Authority d/b/a  
MUSC Health Emergency Services,.....Respondents,

Of Which, Medical University Hospital Authority d/b/a  
MUSC Health Emergency Services is the.....Appellant.

**SECOND JOINT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
RESPONDENTS' INITIAL BRIEFS AND DESIGNATIONS OF MATTER ON APPEAL**

Petitioner/Respondent Trident Medical Center, LLC, d/b/a Trident Medical Center and Summerville Medical Center (“Trident Health”) and Petitioner/Respondent CareAlliance Health Services, d/b/a Roper St. Francis Healthcare, Roper Hospital, Inc., Bon Secours-St. Francis Xavier Hospital, Inc., Roper Mount Pleasant Hospital and Roper St. Francis Berkeley Hospital (“Roper St. Francis”) (collectively, “Respondents”), pursuant to Rules 208(a)(1), 209, 240 and 263(b), SCACR, each respectfully request an extension of time in which to file its Initial Brief and Designation of Matter to be included in the Record on Appeal. Counsel for these Respondents request this second extension due to health issues of lead counsel and due to their current workload including significant briefing obligations in the South Carolina Administrative Law Court and elsewhere. The Respondents’ initial briefs and designations of matter are each currently due on November 30, 2020; accordingly, Trident Health and Roper St. Francis each request that the deadline for filing be extended to and through Friday, December 11, 2020.

The Respondents have consulted with all parties of record and have obtained the consent of all parties to the relief requested in this Joint Motion for Extension of Time.

*[SIGNATURE PAGE FOLLOWS]*

Respectfully submitted,

s/David B. Summer, Jr.

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November 18, 2020  
Columbia, South Carolina

s/Jennifer J. Hollingsworth

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Francis Xavier Hospital, Inc., Roper Mount Pleasant  
Hospital, and Roper St. Francis Berkeley Hospital*

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MUSC Health Emergency Services is the.....Appellant.

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PROOF OF SERVICE

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The undersigned hereby certifies that on November 18, 2020, copies of the *Second Joint Motion For Extension of Time to File and Serve Respondents' Initial Briefs and Designations of Matter on Appeal* were served on all counsel of record via electronic mail containing the above-referenced document to each counsel's individual AIS email address pursuant to SC Supreme Court COVID Order 2020-05-29-02 as follows:

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*s/David B. Summer, Jr.*

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November 18, 2020

VIA EMAIL @ [CTAPPFILINGS@SCCOURTS.ORG](mailto:CTAPPFILINGS@SCCOURTS.ORG)

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

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Re: **Appellate Case No.: 2020-001072**

**Trident Medical Center, LLC, d/b/a Trident Medical Center and Summerville Medical Center v. South Carolina Department of Health and Environmental Control and Medical University Hospital Authority d/b/a MUSC Health Emergency Services AND**

**CareAlliance Health Services, d/b/a Roper St. Francis Healthcare, Roper Hospital, Inc., Bon Secours-St. Francis Xavier Hospital, Inc., Roper Mount Pleasant Hospital and Roper St. Francis Berkeley Hospital v. South Carolina Department of Health and Environmental Control and Medical University Hospital Authority d/b/a MUSC Health Emergency Services**

Dear Ms. Kitchings:

Enclosed for filing in connection with the above, please find the Second Joint Motion For Extension of Time to File and Serve Respondents' Initial Briefs and Designations of Matter on Appeal and Proof of Service.

As copied on this letter, and as evidenced by the Proof of Service, we are providing copies of the same to all counsel of record. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

s/ William R. Thomas

William R. Thomas

Enclosures

cc: Ashley C. Biggers, Esquire (w/encl. via email)  
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