

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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DEC 17 2020
SC Court of Appeals

APPEAL FROM
THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Case No. 17-ALJ-07-0441-CC
Case No. 17-ALJ-07-0444-CC
Appellate Case No. 2020-001072

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 Whom, Medical University Hospital Authority d/b/a
MUSC Health Emergency Services is

Appellant.

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 Whom, Medical University Hospital Authority d/b/a
MUSC Health Emergency Services is

Appellant.

APPELLANT’S MOTION FOR EXTENSION TO FILE REPLY BRIEF

Pursuant to Rules 208(a)(3), 240, and 263(b), SCACR, Appellant Medical University Hospital Authority, d/b/a MUSC Health Emergency Services (“MUSC”) hereby moves for a 30-day extension of the deadline to file a Reply Brief to Petitioners/Respondents’ Initial Briefs. The current deadline is December 21, 2020. If the extension is granted the new deadline would be January 20, 2021. Grounds for the motion are that MUSC’s counsel are engaged in other litigation over the next few weeks, as well as the intervening holidays. Counsel for Petitioners/Respondents have been informed of the intended filing of the motion and have consented.

For the reasons set forth above, MUSC respectfully requests that this motion be granted.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s Daniel J. Westbrook

Daniel J. Westbrook

SC Bar No. 012939

E-Mail: dan.westbrook@nelsonmullins.com

Travis Dayhuff

SC Bar No. 15916

E-Mail: travis.dayhuff@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

*Attorneys for Medical University Hospital Authority d/b/a
MUSC Health Emergency Services*

Columbia, South Carolina

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Authority d/b/a MUSC Health Emergency ServicesRespondents,

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

PROOF OF SERVICE

The undersigned hereby certifies that on December 15, 2020, s/he caused a copy of *Appellant Medical University Hospital Authority's Motion for Extension to File Reply Brief* to be served on all parties to the appeal by electronic mail and U.S. Mail addressed as follows:

Ashley C. Biggers, Esq.
biggersac@dhec.sc.gov
Vito M. Wicevic, Esq.
wicevivm@dhec.sc.gov
SC DHEC – Office of General Counsel
2600 Bull Street
Columbia, SC 29201
*Attorneys for S.C. Department of Health
and Environmental Control*

David B. Summer, Jr., Esq.
davidssummer@parkerpoe.com
William R. Thomas, Esq.
willthomas@parkerpoe.com
Amy S. Flanary-Smith
Amyflanarysmith@parkerpoe.com
PARKER POE ADAMS & BERNSTEIN
1221 Main Street, Suite 1100
Columbia, South Carolina 29201
*Attorneys for Petitioner/Respondent
Trident Medical Center, LLC d/b/a Trident
Medical Center and Summerville Medical
Center*

Jennifer J. Hollingsworth, SC Bar #73535
jhollingsworth@nexsenpruet.com
Shannon V. Lipham, SC Bar #103699
svlipham@nexsenpruet.com
Nexsen Pruet, LLC
1230 Main Street, Suite 700
Columbia, South Carolina 29201
*Attorneys for 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*

s/ Daniel J. Westbrook, Esq.
Daniel J. Westbrook, Esq.
dan.westbrook@nelsonmullins.com
Travis Dayhuff, Esq.
travis.dayhuff@nelsonmullins.com
Nelson Mullins Riley & Scarborough, LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
*Attorneys for Appellant Medical University Hospital
Authority d/b/a MUSC Health Emergency Services*

December 15, 2020
Columbia, South Carolina



Daniel J. Westbrook
T: (803) 255-9456 F: (803) 255-9014
dan.westbrook@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

1320 Main Street, 17th Floor
Columbia, SC 29201
T: 803.799.2000 F: 803.256.7500
nelsonmullins.com

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Via E-Mail and U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street (29201)
P.O. Box 11629
Columbia, SC 29211

RE: 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 Mt. 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

Appellate Case No. 2020-001072
Our File No. 019243/01525

Dear Ms. Kitchings:

Enclosed for filing is Appellant's Medical University Hospital Authority d/b/a MUSC Health Emergency Services' Motion for Extension to File Reply Brief. We are submitting the filing via email and U.S. Mail.

By copy of this letter and pursuant to the Court's standing order regarding operation of the appellate courts during the coronavirus emergency, we hereby serve all counsel via email and U.S. Mail.

Very truly yours,

/s Daniel J. Westbrook

Daniel J. Westbrook

DJW:kh
Enclosures

December 15, 2020

Page 2

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

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NELSON MULLINS RILEY & SCARBOROUGH LLP
Post Office Box 11070
Columbia, South Carolina 29211-1070
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NELSON MULLINS RILEY & SCARBOROUGH LLP
Post Office Box 11070
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