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**Mar 09 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the 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.

**MOTION TO SUPPLEMENT RECORD ON APPEAL  
AND HOLD FILING DEADLINE IN ABEYANCE**

Pursuant to Rule 212 (b) of the South Carolina Rules of Appellate Procedure, Appellant Medical University Hospital Authority moves to supplement the Record on Appeal. Appellant filed its Notice of Appeal on July 31, 2020 and its Initial Brief on September 30, 2020. In its Initial Brief Appellant cited to MUSC Trial Exhibits 18, 30, 31, 32, 34, 49 and pages 16 and 19 of Trial Exhibit 60. However, Appellant inadvertently failed to designate these exhibits to be included in the Record on Appeal. These exhibits are relevant, as indicated by their citations in the Initial Brief.

The deadline for filing the Record on Appeal and Final Brief is March 11, 2021. In order to eliminate the potential necessity of filing in the future an Amended Record on Appeal and Amended Final Briefs, Appellant respectfully requests that the March 11 filing deadline be held in abeyance until the present Motion is resolved.

For the reasons set forth above, Appellant moves the Court to allow Appellant to supplement the Record on Appeal and to hold in abeyance the March 11 filing deadline for the Record on Appeal and Final Briefs.

By: /s Daniel J. Westbrook  
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CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Medical University Hospital Authority d/b/a MUSC Health Emergency Services, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by electronic mail to the following address(es):

Pleadings: **MOTION TO SUPPLEMENT RECORD ON APPEAL AND HOLD FILING DEADLINE IN ABEYANCE**

**MOTION TO SEAL**

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March 9, 2021