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STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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The Honorable Michael J. Baxley, Circuit Court Judge

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Case No.: 2007-CP-10-1553

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Jamesetta Washington, as Guardian ad Litem, for  
Jayden Washington, a minor, .....Appellants,

v.

Edmund Rhett, Jr., M.D., Low Country Obstetrics and Gynecology, P.A.; Tenet  
South Carolina, Inc. d/b/a East Copper Regional Medical Center and AMN  
Services, Inc. f/k/a Nurses RX Inc,.....Defendants,

Of Whom Edmund Rhett, Jr. MD is.....Respondent

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**MOTION FOR EXTENSTION OF TIME TO  
FILE REPLY BRIEF OF APPELLANT**

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COMES NOW, the Appellant, Jamesetta Washington, as Guardian ad Litem for Jayden Washington, a minor, by and through their undersigned counsel hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 10 days to file its Appellant's Final Brief and Final Reply Brief in this action, or until **April 11, 2013**, to file said Briefs. In support hereof, the undersigned states the following:

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1. The undersigned needs additional time to properly complete the Brief due to Appellant's being out of town to attend a funeral of his father-in-law.
2. Appellant having a Petition for Rehearing due to the Supreme Court during this same time period.
2. The current deadline is April 1, 2013.
3. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.
4. Respondent's counsel, Chilton Simmons, agreed to Consent to this Motion.

WHEREFORE, Appellant respectfully requests until **April 11, 2013** in which to file its Final Brief and Final Reply Brief in this action.

Respectfully submitted,

GRAHAM LAW FIRM, P.A.



BY: \_\_\_\_\_

Edward L. Graham  
P.O. Box 550  
Florence, SC 29503  
843-662-3281-T  
843-665-0254-F

**Attorney for Appellant**

March 26, 2013

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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The Honorable Michael J. Baxley, Circuit Court Judge

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Tenet South Carolina, Inc. d/b/a East Cooper Regional Medical Center.....Respondents.


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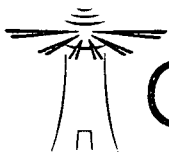
**PROOF OF SERVICE**

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The undersigned, an attorney in this matter certifies that I have this **26th day of March, 2013**, served a copy of a **Motion for Extension of Time to File Appellants Final Brief and Final Reply Brief** upon counsel for the Respondent by depositing in the United States mail, first-class postage prepaid, addressed to:

Robert H. Hood, Esq.  
Molly H. Craig, Esq.  
Chilton Grace Simmons, Esq.  
Deborah H. Sheffield, *of counsel*  
Hood Law Firm, LLC  
P.O. Box 1508  
Charleston, SC 29402

By:   
\_\_\_\_\_  
Edward L. Graham  
Graham Law Firm, P.A.  
P.O. Box 550  
Florence, SC 29503  
(843) 662-3281  
Attorney for the Appellant



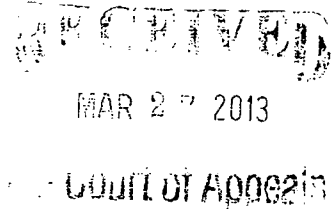
# GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham  
Mary H. Watters  
J. Layton Ruffin

March 26, 2013

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201



**RE: *Jamesetta Washington, as Guardian ad Litem of Jayden Washington, a minor v. Edmund Rhett, Jr. et al.***  
**Case # 2007-CP-10-1553**

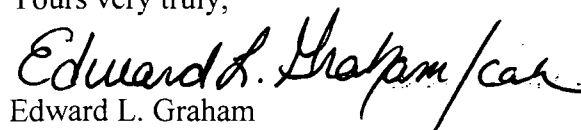
Dear Ms. Kitchings:

Enclosed please find my firm's check in the amount of \$25.00 along with an original and 6 copies of a Motion for Extension of Time to File Appellant's Final Brief and Final Reply Brief in the above referenced matter until April 11, 2013.

As per the attached Proof of Service, we are serving all counsel of record with a copy of this request.

With kindest personal regards, I am

Yours very truly,

  
Edward L. Graham

ELG/cah

Enclosures