

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**Nov 12 2021**  
SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

H.W. Funderburk, Jr., Administrative Law Court Judge

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Docket No. 20-ALJ-07-0235-CC

Appellate Case No. 2021-000617

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MRI at Belfair, LLC d/b/a 3T MRI at Belfair .....Appellant,

v.

South Carolina Department of Health  
and Environmental Control and  
Beaufort Memorial Hospital ..... Respondents.

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APPELLANT’S MOTION FOR EXTENSION OF TIME  
TO FILE REPLY BRIEF

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Pursuant to Rule 240, SCACR, Appellant MRI at Belfair, LLC, d/b/a 3T MRI at Belfair (“Appellant”) hereby requests an extension of time to file its Reply Brief to Respondent South Carolina Department of Health and Environmental Control’s (“SCDHEC”) and Beaufort Memorial Hospital’s (“BMH”) Initial Briefs.

Pursuant to Rule 208, SCACR, Appellant’s Reply Brief to Respondent SCDHEC’s Initial Brief is due November 18, 2021. However, pursuant to the Order entered November 3, 2021, Respondent BMH’s deadline to file its Initial Brief was extended to November 22, 2021. As the deadline to file a Reply to Respondent SCDHEC’s Initial Brief is earlier than BMH’s deadline to file its Initial Brief, Appellant would be required to file its Reply without having been able to review the Initial Briefs of all Respondents. For these reasons, Appellant submits that good cause

exists for this extension to file its consolidated Reply Brief to both Respondents' Briefs. Thus, Appellant respectfully requests that, for good cause shown, the deadline to file Appellant's Reply Brief be extended to 10 days after Respondent BMH serves its Initial Brief.

For these reasons, Appellant respectfully moves for an extension of time to file and serve its Reply Brief up to and including 10 days after Respondent BMH serves its Initial Brief.

Respectfully submitted,

*s/ Victoria T. Kepes*

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*Attorneys for Appellant MRI at Belfair, LLC,  
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November 11, 2021  
Charleston, South Carolina

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Nov 12 2021

PROOF OF SERVICE SC Court of Appeals

It is hereby certified that a true and correct copy of the foregoing document has been served via email upon all parties as properly addressed below this 11<sup>th</sup> day of November, 2021:

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November 11, 2021

**VIA E-MAIL**

The Honorable Jenny Abbott Kitchings  
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Re: *MRI at Belfair, LLC, d/b/a 3T MRI at Belfair v. South Carolina Department of Health and Environmental Control and Beaufort Memorial Hospital*  
Case No.: 2021-000617


Dear Ms. Kitchings:

Please find enclosed for filing, *Appellant's Motion for Extension of Time to File Reply Brief and Proof of Service*. We appreciate your assistance in this matter and please do not hesitate to contact me should you need anything further.

With kind regards, I am,

Very truly yours,

GORDON REES SCULLY MANSUKHANI, LLP



Victoria T. Kepes, Esquire

VTK/ms  
Enclosures

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