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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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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 the Order dated November 15, 2021, Appellant’s Reply Brief to Respondents’ Initial Briefs is due December 2, 2021. Appellant submits that good cause exists for this extension. Undersigned Counsel for Appellant had surgery on November 24, 2021, and is still home in the recovery process. Further, while attempting to work from home this week, counsel has had a number of deadlines in multiple matters after last week’s holiday. 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 an additional seven (7) days, or until and including December 9, 2021.

For these reasons, Appellant respectfully moves for an extension of time to file and serve its Reply Brief up to and including December 9, 2021.

Respectfully submitted,

s/ Victoria T. Kepes  
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*Attorneys for Appellant MRI at Belfair, LLC,  
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December 2, 2021  
Charleston, South Carolina

**Dec 02 2021****SC Court of Appeals****PROOF OF SERVICE**

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 2<sup>nd</sup> day of December, 2021:

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December 2, 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

cc (via E-mail): Trudy H. Robertson, Esq.  
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