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Jan 10 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2021-001036
Case No. 2021-CP-04-0470

Travis Walker, Individually and as Personal Representative
of the Estate of Douglas Williford, and Lolita Moore,..... Appellant,

v.

AnMed Health, Anderson Emergency Associates, P.A.,
Kevin Morton NP, Jamie Moon RN, and Betty Boyles RN,..... Defendants,

Of Whom Anderson Emergency Associates P.A., and Kevin
Morton NP are..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENTS**

The Respondents Anderson Emergency Associates P.A., and Kevin Morton
NP respectfully move this Court for an additional extension of time until January

31, 2022, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Respondents' motion is based on the following grounds:

1. The Respondents' Initial Brief is currently due to be filed and served on or before January 12, 2022.

2. The undersigned counsel requires additional time to complete the Respondents' Initial Brief due to other court appearances, obligations and court deadlines, including a trial in the Richland County Court of Common Pleas during the week of January 4, 2022. The undersigned counsel also had a death in the family on January 5, 2022, which delayed his progress in the preparation of the Initial Brief.

3. The undersigned has consulted with Jordan Calloway, counsel for the Appellant, and he consented to the requested extension by email (copy attached).

WHEREFORE, the Respondents Anderson Emergency Associates P.A., and Kevin Morton NP respectfully request that they be allowed until January 31, 2022, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann
ANDREW F. LINDEMANN #13030
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
T: 803-881-8920
Email: andrew@ldlawsc.com

*Counsel for Respondents Anderson
Emergency Associates P.A., and Kevin
Morton NP*

January 10, 2022

From: [Jordan Calloway](#)
To: [Andrew Lindemann](#)
Cc: [Jay Wright](#); "Pat Paschal"
Subject: Re: Walker v. Anderson Emergency Associates P.A. and Morton - Case No. 2021-001036
Date: Monday, January 10, 2022 9:53:59 AM

Andrew:

Sorry to hear about your family situation. We consent to the extension.

Thanks,

Jordan Calloway
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732
(803) 327-7800

From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Monday, January 10, 2022 9:48 AM
To: Jordan Calloway <jordan@mcgowanhood.com>
Cc: Jay Wright <jaywright@mcgowanhood.com>; 'Pat Paschal' <hwp@ppalaw.com>
Subject: Walker v. Anderson Emergency Associates P.A. and Morton - Case No. 2021-001036

Jordan:

I hope you are doing well. I have a favor to ask. My clients' Initial Respondent's Brief is due in the Court of Appeals on Wednesday. I am behind in my preparation primarily as a result of being in trial last week and having to get that case ready for trial the week before that, plus I had a death in the family late last week. I plan to request an additional 21 day extension on this brief. Please let me know if you will consent to that extension request so that I may include your position in my motion. I would like to get that motion filed today.

Thanks for your consideration of this request.

Andrew

Andrew F. Lindemann
Lindemann & Davis, P.A.
5 Calendar Court, Suite 202
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Columbia, South Carolina 29260
Direct Dial: 803-881-8921
Email: andrew@ldlawsc.com

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CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court's Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, the undersigned employee of Lindemann & Davis, P.A., counsel for the Respondents Anderson Emergency Associates P.A., and Kevin Morton NP, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondents** in the above-captioned matter was made upon all counsel of record by email only this the 10th day of January 2022 as follows:

Jordan C. Calloway, Esquire

Jay F. Wright, Esquire

McGowan, Hood & Felder, LLC

Email: jcalloway@mcgowanhood.com

Email: jaywright@mcgowanhood.com

Howard W. Paschal, Jr., Esquire

Email: hwp@ppalaw.com

s/ Andrew F. Lindemann



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JAMES M. DAVIS, JR.†
Direct Dial: (803) 881-8922
Email: jim@ldlawsc.com

*Also Admitted in North Carolina
†Certified Mediator

January 10, 2022

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

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SC Court of Appeals

RE: Travis Walker, Individually and as Personal Representative of the Estate of Douglas Williford, and Lolita Moore v. AnMed Health, Anderson Emergency Associates, P.A., Kevin Morton NP, Jamie Moon RN, and Betty Boyles RN
SCCA Appellate Case Number: 2021-001036
Civil Action Number: 2021-CP-04-0470
Our File Number: 22.20510

Dear Ms. Kitchings:

In accordance with Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing the **Motion for Extension of Time to File Initial Brief of Respondents** in the above referenced matter. In accordance with Section (d)(1) of this same order, I am hereby serving copies on all counsel of record by email only. A check for the \$50.00 filing fee has been placed in the U.S. Mail.

If you have any questions, please advise. Thank you for your consideration of this request.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosure

cc: Jordan C. Calloway, Esquire (w/ Enclosure, Via Email Only)
Jay F. Wright, Esquire (w/ Enclosure, Via Email Only)
Howard W. Paschal, Jr., Esquire (w/ Enclosure, Via Email Only)