

RECEIVED

Feb 17 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM ANDERSON COUNTY
COURT OF COMMON PLEAS
THE HONORABLE R. LAWTON McINTOSH
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2021-001129
CIVIL ACTION NOS. 2021-NI-04-00011 and 2021-CP-04-01458

Anita and James Chabek,

APPELLANTS,

versus

AnMed Health and Larry Davidson, MD,

RESPONDENTS.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondents, AnMed Health and Larry Davidson, MD, and Designation of Matter to be Included in the Record on Appeal were originally due on January 18, 2022. At the Respondents' request, the Court granted a 30-day extension of time, until February 17, 2022, to serve and file the Respondents' Initial Brief and Designation of Matter. The Respondents, AnMed Health and Larry Davidson, MD, respectfully request the Court to grant a second extension until Thursday, March 3, 2022, to serve and file their Initial Brief of Respondents and Designation of Matter.

Counsel for the Respondents request a second extension due to the undersigned's workload and vacation schedules of co-counsel.

Counsel for the Respondents has contacted the Appellants' counsel and he consents to this request as indicated in the attached document.

Accordingly, the Respondents, AnMed Health and Larry Davidson, MD, respectfully request an additional extension of time until March 3, 2022 in which to serve and file their Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani (S.C. Bar No. 73515)
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
cganjehsani@richardsonplowden.com

Marian Williams Scalise (S.C. Bar No. 6744)
RICHARDSON, PLOWDEN & ROBINSON, PA
2103 Farlow Street
P.O. Box 3646
Myrtle Beach, South Carolina 29578
(843) 443-3581
mscalise@richardsonplowden.com
**ATTORNEYS FOR RESPONDENT
ANMED HEALTH**

Fred W. "Trey" Suggs, III (S.C. Bar No. 70222)
ROE CASSIDY COATES & PRICE, P.A.
P.O. Box 10529
Greenville, South Carolina 29603
(803) 349-2600
tsuggs@roecassidy.com
**ATTORNEYS FOR RESPONDENT
LARRY DAVIDSON, MD**

February 17, 2022.

EXHIBIT “1”

Carmen Ganjehsani

From: Jordan Calloway <jordan@mcgowanhood.com>
Sent: Wednesday, February 16, 2022 8:54 AM
To: Carmen Ganjehsani
Subject: Re: Chabek v. AnMed Health et al. (Appellate Case No. 2021-001129)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Sure. We consent.

Thanks,

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

From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Wednesday, February 16, 2022 7:35 AM
To: Jordan Calloway <jordan@mcgowanhood.com>
Subject: Re: Chabek v. AnMed Health et al. (Appellate Case No. 2021-001129)

Jordan,

Our brief is due tomorrow, February 17, and while I have it prepared, I did not realize Marian Scalise is on vacation this week since we are in different offices and she needs to review it. Would you consent to one final two week extension?

Thank you,

Carmen Ganjehsani

On Dec 17, 2021, at 10:03 AM, Jordan Calloway <jordan@mcgowanhood.com> wrote:

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Madam Clerk:

Pursuant to Rule 262(a)(3), SCACR and Section (b)(2) of the South Carolina Supreme Court's August 25, 2021, order (Order No. 2020-08-25-02), I am attaching for filing the Initial Brief of Appellants, a Designation of Matter to be Included in the Record on Appeal, and a certificate of service for both documents.

Thanks,

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

RECEIVED

Feb 17 2022

SC Court of Appeals

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Respondents, AnMed Health and Larry Davidson, MD, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated February 17, 2022, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Order dated August 25, 2021, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Jay F. Wright
MCGOWAN, HOOD & FELDER, LLC
P.O. Drawer 1778
Anderson, South Carolina 29622-1778
jaywright@mcgowanhood.com

Jordan C. Calloway
MCGOWAN, HOOD & FELDER, LLC
1539 Health Care Drive
Rock Hill, SC 29732
jcalloway@mcgowanhood.com
Attorneys for Appellants

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani
S.C. Bar No. 73515
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400

ATTORNEYS FOR RESPONDENTS

Dated: February 17, 2022.