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Oct 11 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Appellate Case.: 2023-000952

Kellie Bingham and Kayla BinghamAppellants-Respondents

-v-

Medical University of South Carolina.....Respondent-Appellant.

**APPELLANTS-RESPONDENTS' CONSENT MOTION FOR EXTENSION OF
TIME TO FILE AND SERVE THEIR INITIAL BRIEF AND DESIGNATION OF
MATTER FOR INCLUSION IN THE RECORD ON APPEAL**

Appellants Kellie and Kayla Bingham, pursuant to Rule 263 of the South Carolina Appellate Court Rules, respectfully request a thirty (30) day extension of time to file and serve their Initial Brief and Designation of Matter for inclusion in the Record on Appeal. This request is necessary due to the undersigned counsel's numerous other work conflicts, scheduling deadlines, a date certain trial, and the complexity and volume of issues in this appeal.

The undersigned counsel for Appellants-Respondents has consulted with counsel for Respondent-Appellant and he consents to this motion.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

PARKER LAW GROUP, LLP

By: _____

A handwritten signature in blue ink, appearing to be 'JP', written over a horizontal line.

John E. Parker, Jr., Esq.

John E. Parker, Esq.

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Attorneys for Appellants-Respondents

October 11, 2023

Hampton, South Carolina

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Motion for Extension of Time to file Respondent's, Initial Brief and Designation of Matter has been served upon the following counsel of record by emailing a copy of the same, this 11 day of October 2023.

M. Dawes Cooke, Jr., Esq.
John W. Fletcher, Esq.
BARNWELL, WHALEY, PATTERSON, AND HELMS, LLC
P.O. Drawer H (29402)
211 King Street, Suite 300
Charleston, SC 29401
(843) 577-7700
Counsel for Defendant Medical University of South Carolina

[SIGNATURE PAGE FOLLOWS]

By:  _____

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Attorneys for Appellants

October 11, 2023

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SC Court of Appeals

Via Email Only: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

**Re: *Kellie & Kayla Bingham v. MUSC*
*Appellate Case No. 2023-000952***

Dear Ms. Kitchings:

Please find enclosed for filing, Motion for Extension of Time to file Respondent's, Initial Brief, and Designation of Matter and Proof of Service in regards to the above reference matter. In addition, our firm's check in the amount of \$50.00 will go out in today's mail for the filing fee.

By copy of this letter, Respondent's Motion is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JEP/cc

Enclosures as stated.

Cc: John W. Fletcher, Esquire (via email only)

M. Dawes Cooke, Jr., Esquire (via email only)