

**RECEIVED**

**Oct 16 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-10-05699

Kellie Bingham and Kayla Bingham ..... Plaintiffs/Respondents

vs.

Medical University of South Carolina ..... Defendant/Appellant

NOTICE OF APPEAL

Defendant/Appellant Medical University of South Carolina ("MUSC") hereby appeals from the September 19, 2023 Order of Kristi F. Curtis, Circuit Court Judge (attached hereto as Exhibit A) denying MUSC's Post-Trial Motions. Defendant/Appellant MUSC received written notice of entry of this Order on September 19, 2023. This Notice of Appeal is timely served pursuant to Rule 203(c), SCACR.

ELECTRONICALLY FILED - 2023 Oct 16 2:17 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005699

The parties to this appeal are also parties to Appellate Case Number 2023-000952, in which MUSC filed a cross-appeal of a previous Form 4 Order denying its Post-Trial Motions. MUSC believes that this appeal should be consolidated with Appellate Case Number 2023-000952.

October 16, 2023

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

By: 

John W. Fletcher (SC Bar No.: 69550)

211 King Street, Suite 300

Charleston, SC 29401

Phone: (843) 577-7700

*Attorneys for Defendant/Appellant Medical  
University of South Carolina*

**Other Counsel of Record:**

John E. Parker, Jr., Esq.

John E. Parker, Esq.

PARKER LAW GROUP, LLP

Post Office Box 487

Hampton, South Carolina 29924

Phone: (803) 903-1781

*Attorneys for Plaintiffs/Respondents Kellie Bingham and Kayla Bingham*

RECEIVED

Oct 16 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-10-05699

Kellie Bingham and Kayla Bingham ..... Plaintiffs/Respondents

vs.

Medical University of South Carolina ..... Defendant/Appellant

PROOF OF SERVICE OF NOTICE OF APPEAL

[Continued on Following Page]

I certify that I have served the Notice of Appeal on the above-referenced Respondents by email and by depositing a copy of it in the United States Mail, postage prepaid, on October 16, 2023, addressed to their attorneys of record:

John E. Parker, Jr., Esq.  
John E. Parker, Esq.  
PARKER LAW GROUP, LLP  
Post Office Box 487  
Hampton, South Carolina 29924  
jparker@parkerlawgroupsc.com  
jayparker@parkerlawgroupsc.com

*Attorneys for Respondents/Respondents Kellie Bingham and Kayla Bingham*

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

By: 

M. Dawes Cooke, Jr.

John W. Fletcher

211 King Street, Suite 300

Charleston, SC 29401

Phone: (843) 577-7700

*Attorneys for Defendant/Appellant Medical  
University of South Carolina*

EST. 1938

# BARNWELL WHALEY

ATTORNEYS AT LAW

JOHN W. FLETCHER  
SPECIAL COUNSEL  
JFLETCHER@BARNWELL-WHALEY.COM

October 16, 2023

RECEIVED

Oct 16 2023

SC Court of Appeals

1.657

Ms. Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

RE: *Kellie Bingham and Kayla Bingham v. MUSC*  
Case No. 2017-CP-10-05699

Dear Madame Clerk:

Enclosed please find a Notice of Appeal on behalf of Defendant/Appellant Medical University of South Carolina, and a Proof of Service of the same. A check in the amount of \$250.00 for the court's filing fee accompanies this correspondence.

Sincerely,



John W. Fletcher

JWF/klj

Enclosure

c: John E. Parker, Jr., Esq.  
John E. Parker, Esq.

{01290619.DOCX.1}

BARNWELL WHALEY PATTERSON & HELMS LLC

211 KING STREET, SUITE 300  
CHARLESTON, SC 29401  
P: 843-577-7700 F: 843-577-7708

201 NORTH FRONT STREET, SUITE 1003  
WILMINGTON, NC 28401  
P: 910-679-1388 F: 910-679-4663

BARNWELL-WHALEY.COM