

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE CHARLSTON COUNTY
Court of Common Pleas

RECEIVED

Nov 03 2023

Honorable Jean Toal, Circuit Court Judge

SC Court of Appeals

Civil Action No. 2016-CP-10-06683

Jian-Yun (John) Dong, M.D., Ph.D., Appellant

v.

The Medical University of South Carolina, Respondent

NOTICE OF APPEAL

Appellant Jian-Yun (John) Dong, hereby submit this Timely Notice of Appeal of the Order granting Defendant's Motion for Summary Judgment issued on July 17, 2023, and the Order Denying Motion for Reconsideration/Amendment issued on September 22, 2023, by the Honorable Jean Taol.

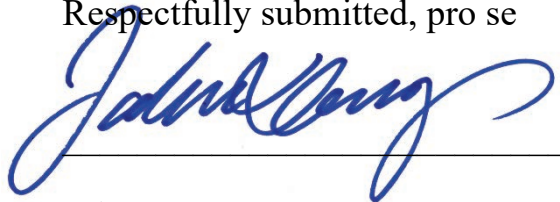
This Notice is **timely** because Appellant was not granted the access to the ECF system of the Court of Common Plea, did not receive the notice of either entry from the court electronically or by the mail. The Appellant only received the notice of the

entries forwarded by the Defendant using USPS mails on **October 5th 2023**, which was mailed on October 3, 2023 (a copy is attached).

Furthermore, Appellant filed a motion for Judicial Recusal due to the appearance of bias, which stays the time. The denial of the motion was entered on October 4th, 2023, and a notice forwarded by the Defendant was received on **October 6, 2023**.

November 3, 2023,

Respectfully submitted, pro se



John Dong, M. D., Ph. D.

71 Delahow St

Charleston, SC 29492

Email: johny.dong@gmail.com

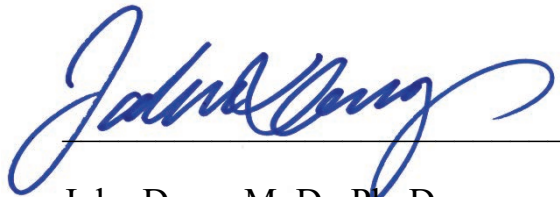
Phone: 843-991-2332

CERTIFICATE OF SERVICE

This is to certify that I have this 3 day of September 2023, caused to be served a copy of the Plaintiff's Notice of Appeal via Email at bconley@clevelandlaborlaw.com and United States Mail Services with postage and addressed as the follows:

Bob J. Conley, Esq.
Cleveland & Conley LLC
171 Church Street, suite 310
Charleston, South Carolina 29401

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SC Court of Appeals



John Dong, M. D., Ph. D.
71 Delahow St
Charleston, SC 29492
Email: johny.dong@gmail.com
Phone: 843-991-2332

Attachment:

1. Notice received by mail for Order Denying Motion Amendment and the Envelope
2. Notice received by mail for Order Denying Motion for Recusal due to Appearance of Bias.
3. Order Granting Defendant's Motion for Summary Judgement
4. Order Denying Plaintiff's Motion of Amendment