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Jan 26 2024

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 RESPONDENT BRIEF AND
DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL**

Appellants-Respondents 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 Respondent 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, and the complexity and volume of issues in this appeal. This is Appellants-Respondents first request for an extension to file their Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal.

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

Respectfully submitted,

PARKER LAW GROUP, LLP

By: _____



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January 26, 2024
Hampton, South Carolina

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Appellants-Respondents' Consent Motion for Extension of Time to File and Serve their Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal has been served upon the following counsel of record by emailing a copy of the same, this 26th day of January 2024.

M. Dawes Cooke, Jr., Esq.
John W. Fletcher, Esq.
BARNWELL, WHALEY, PATTERSON, AND HELMS, LLC
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(843) 577-7700
Counsel for Defendant Medical University of South Carolina

[SIGNATURE PAGE FOLLOWS]

By: 

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Attorneys for Appellants-Respondents

January 26, 2024

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 Bingham and Kayla Bingham v. Medical Univ. of S.C.*
*Appellate Case No. 2023-000952***

Dear Ms. Kitchings:

Please find enclosed for filing Appellants-Respondents Kellie Bingham and Kayla Bingham's Consent Motion for Extension of Time to File and Serve their Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal and Proof of Service with regard to the above referenced 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, Appellants-Respondents' Motion is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated.

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

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