

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

Appellate Case No. 2023-000952

Kelly Bingham and Kayla Bingham..... Appellants-Respondents,

v.

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

**RESPONDENT-APPELLANT'S SECOND CONSENT MOTION FOR EXTENSION OF  
TIME TO FILE AND SERVE ITS INITIAL RESPONDENT BRIEF AND  
DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL**

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**RESPONDENT-APPELLANT'S SECOND CONSENT MOTION FOR EXTENSION OF  
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AND NOW COMES Respondent-Appellant Medical University of South Carolina (“MUSC”), by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days additional time to file and serve its Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal.

1. Appellants-Respondents Kellie Bingham and Kayla Bingham served and filed their Initial Brief of Appellants on or about January 3, 2024.

2. By order dated February 6, 2024, the Court extended the deadline for Respondent-Appellant MUSC's Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal to March 4, 2024.

3. Due to the complexity and volume of issues in this appeal and the volume of the trial transcript, all parties to this appeal (to ensure that all deadlines are in alignment) are requesting second extensions of time to file their Respondent Briefs and Designations of Matter for Inclusion in the Record on Appeal.

4. Respondent-Appellant MUSC's counsel requests a second extension of 30 days from March 4, 2024 to file and serve its Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal.

5. Specifically, Appellant MUSC respectfully requests that the Court extend this deadline by 30 days, until Wednesday April 3, 2024.

6. Respondent-Appellant MUSC believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon any party.

7. Respondent-Appellant MUSC will not require a further extension of time to file its Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal.

8. Counsel for Appellants-Respondents Kellie Bingham and Kayla Bingham has consented to the relief requested herein.

WHEREFORE, for the foregoing reasons, Respondent-Appellant Medical University of South Carolina moves this Honorable Court to grant it an extension of 30 days to file and serve its Initial Respondent Brief and its Designation of Matter for Inclusion in the Record on Appeal related thereto. With the requested extension of time, the new deadline for filing and serving Respondent-Appellant's Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal will be April 3, 2024. Additionally, Respondent-Appellant MUSC respectfully requests that the Court hold its present deadline for the service and filing of its Initial Respondent Brief and Designation of Matter for Inclusion in the Record on Appeal in abeyance until it acts upon this Motion.

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February 26, 2024

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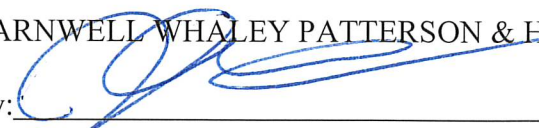
Medical University of South Carolina .....Respondent-Appellant.

PROOF OF SERVICE

I certify that I have served the **RESPONDENT-APPELLANT'S SECOND CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE ITS INITIAL RESPONDENT BRIEF AND DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL** on counsel for the above-referenced Appellants-Respondents by email in accordance with the South Carolina Supreme Court's Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022) on February 26, 2024, addressed to her attorneys of record:

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