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Apr 10 2024

SC Court of Appeals

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' MOTION FOR EXTENSION OF TIME TO FILE
AND SERVE THEIR INITIAL REPLY BRIEF AS APPELLANTS**

Appellants-Respondents Kellie and Kayla Bingham, pursuant to Rule 263 of the South Carolina Appellate Court Rules, respectfully request a twenty (20) day extension of time to file and serve their Initial Reply Brief. 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 Reply Brief.

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: _____

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

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Attorneys for Appellants-Respondents

April 10, 2024

Hampton, South Carolina

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Motion for Extension to File and Serve their Initial Reply Brief as Appellants has been served upon the following counsel of record by emailing a copy of the same, this 10th day of April 2024.

M. Dawes Cooke, Jr., Esq.

John W. Fletcher, Esq.

BARNWELL, WHALEY, PATTERSON, AND HELMS, LLC

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Counsel for Respondent-Appellant Medical University of South Carolina

[SIGNATURE PAGE FOLLOWS]

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ATTORNEYS FOR APPELLANTS-
RESPONDENTS

April 10, 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 & Kayla Bingham v. MUSC
Appellate Case No.: 2023-000952***

Dear Ms. Kitchings:

Please find enclosed for filing Appellants-Respondents' Motion for Extension to File and Serve their Initial Reply Brief as Appellants and Proof of Service in the above-referenced case. 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, I am serving all counsel of record with a copy of the same.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Attachments as stated.

cc: M. Dawes Cooke, Jr., Esquire (via email)
John W. Fletcher, Esquire (via email)