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May 28 2024
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Circuit Court Judge Jean Toal

Case No. 2023-001733

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

Appellant,

v.

Medical University of South Carolina,

Respondent.

**SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL
BRIEF AND DESIGNATION OF MATTER**

Respondent Medical University of South Carolina (“MUSC”), through its undersigned counsel, hereby requests of this Honorable Court, a second extension of time in which to file Respondent's Initial Brief and Designation of Matter in the above-referenced matter. Respondent's Initial Brief and Designation of Matter are due Friday, May 31, 2024. Obligations of Respondent’s counsel on other cases and related deadlines necessitate an extension of time in order for the undersigned firm to prepare Respondent's Initial Brief and Designation of Matter.

In particular, Respondent’s counsel has three briefs due in federal district court between Tuesday, May 28, 2024, and Friday, June 7, 2024, related to briefing deadlines that were unknown when Respondent requested the first extension. Additionally, Respondent’s counsel is involved in

thirteen COVID-19 vaccine mandate lawsuits pending in federal district court, seven with summary judgment motions due on Monday, June 10, 2024.

For the reasons discussed, the undersigned respectfully requests a fourteen (14) day extension, until Friday, June 14, 2024, in which to prepare Respondent's Initial Brief and Designation of Matter.

Respectfully submitted,

s/ Bob J. Conley _____
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Attorneys for Respondent

Charleston, South Carolina
Date: May 28, 2024

Others of Record:

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Pro Se Appellant

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**PROOF OF SERVICE OF MOTION FOR SECOND EXTENSION OF TIME FOR
RESPONDENT TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

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Attorneys for Respondent

I hereby certify that on May 28, 2024, I served a copy of Respondent's Motion for Second Extension of Time for Respondent to File Initial Brief and Designation of Matter on the following:

John Dong, M.D., Ph.D.,
Pro Se Plaintiff
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by email to both email addresses and by placing a copy of said document in the United States mail with sufficient postage thereon.

s/ Bob J. Conley
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Attorneys for Respondent

Charleston, South Carolina
Date: May 28, 2024