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May 15, 2025

VIA EMAIL: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
May 15 2025
SC Court of Appeals

Re: ***Serge R. Wandji v. The Regional Medical Center***
Appellate Case No.: 2025-000108
Trial Court Case No.: 2023-CP-38-00331

Dear Ms. Kitchings:

Respondent The Regional Medical Center ("Regional Medical Center") respectfully submits this reply to Appellant's opposition to Regional Medical Center's first request for an extension of time to file Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal in Appellate Case No. 2025-000108.

Pro Se Appellant's letter opposing Respondent's first request for an extension of time grossly mischaracterizes the facts, and Regional Medical Center firmly objects to Appellant's assertion that Regional Medical Center utilized delay tactics in the underlying trial court matter and somehow seeks to do the same here. It is unclear how Regional Medical Center's requested extension prejudices the pro se Appellant, particularly when it was the pro se Appellant's own failure to comply with the Rules that resulted in multiple delays in the initiation of this appeal.

Respondent acted in good faith and in compliance with the Rules of Civil Procedure in the lower court and does the same here. Respondent's request for a thirty-day extension is reasonable, it is made in good faith, and it is made in accordance with the South Carolina Appellate Court Rules. It is not being requested for purposes of unnecessary delay or to prejudice the Appellant. Accordingly, Respondent respectfully requests that the Court grant the requested thirty-day extension, up to and including June 20, 2025.

Enclosed herewith is a Proof of Service evidencing service of this reply on Appellant.

PPAB 12373949v1

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Sincerely,

A handwritten signature in blue ink that reads "Amanda Williams". The signature is written in a cursive style with a large initial 'A'.

Amanda C. Williams

Enclosures

cc: Serge R. Wandji (via electronic mail and U.S. Mail)

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas
Maite Murphy, Circuit Court Judge

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May 15 2025
SC Court of Appeals

Appellate Case No. 2025-000108
Case No.: 2023-CP-38-00331

Serge R. Wandji.....Appellant,

v.

The Regional Medical Center.....Respondent,

PROOF OF SERVICE

The undersigned hereby certifies that a copy of **RESPONDENT'S REPLY IN SUPPORT OF FIRST REQUEST FOR AN EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER** was served on Appellant, Serge R. Wandji this 15th day of May 2025, by electronic mail and U.S. mail, as follows:

Serge R. Wandji
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s/Amanda C. Williams

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