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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.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S RETURN TO
APPELLANT'S MOTION TO STRIKE FINAL RESPONSE BRIEF**

Respondent Medical University of South Carolina (“MUSC”), through its undersigned counsel, hereby requests an extension of time to file Respondent's return (the “Return”) to Appellant’s Motion to Strike Final Response Brief. The Return is due Wednesday, September 3, 2025. However, a family medical matter that arose on Tuesday, September 2, 2025, necessitates an extension of time for Respondent’s Counsel to prepare the Return.

For the reasons discussed, the undersigned respectfully requests a fourteen (14) day extension, until Wednesday, September 17, 2025, to prepare, file and serve the Return.

Respectfully submitted,

s/ Bob J. Conley

Caroline Cleveland
Bob J. Conley
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
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Attorneys for Respondent

Charleston, South Carolina

Date: September 3, 2025

Others of Record:

John Dong, M.D., Ph. D.
Pro Se Plaintiff
71 Delahow Street
Charleston, SC 29492
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Pro Se Appellant

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**PROOF OF SERVICE OF MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT'S RETURN TO APPELLANT'S MOTION TO STRIKE FINAL
RESPONSE BRIEF**

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Attorneys for Respondent

I hereby certify that on September 3, 2025, I served a copy of Respondent's Return to Appellant's Motion to Strike Final Response Brief on the following:

John Dong, M.D., Ph.D.,
Pro Se Plaintiff
71 Delahow Street
Charleston, SC 29492
johny.dong@gmail.com
johny.dong@me.com

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
Caroline Cleveland
Bob J. Conley
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Attorneys for Respondent

Charleston, South Carolina
Date: September 3, 2025

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CAROLINE WRENN CLEVELAND †
BOB J. CONLEY *

†CERTIFIED SPECIALIST,
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September 3, 2025

Via Email and U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

Re: Jian-Yun (John) Dong v. The Medical University of South Carolina
Appellate Case No.: 2023-001733
Civil Action Number: 2016-CP-10-06683

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the 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), please find enclosed for filing Respondent's **Motion for Extension of Time to File Respondent's Return to Appellant's Motion to Strike Final Brief** in the above referenced matter. In accordance with Section (d)(1) of this same Order, I am hereby serving a copy on the Appellant.

Additionally, the \$50.00 filing fee is enclosed.

Yours truly,

CLEVELAND & CONLEY, LLC

s/ Bob J. Conley

Bob J. Conley

BJC/md

Enclosures: as stated

cc: Jian-Yun (John) Dong