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**Sep 12 2025**

**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.

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**RETURN TO APPELLANT’S MOTION TO STRIKE FINAL RESPONSE BRIEF**

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Respondent Medical University of South Carolina (“MUSC”), through its undersigned counsel, hereby responds to Appellant’s Motion to Strike Final Response Brief (the “Motion”) filed by Appellant on August 25, 2025. The Court should deny the Motion.

**1. Appellant’s Contentions are Without Merit.**

Appellant’s assertion that the Amended Brief of Respondent filed on June 4, 2025, “fails to present legal analysis, authority, or accurate citations” is demonstrably inaccurate upon review of the Amended Brief of Respondent. Consequently, Appellant’s contention is without merit. Likewise, Appellant’s assertion that the Amended Brief of Respondent offers only “general denials and recitations to procedural history without addressing the substance of Appellant’s arguments” is demonstrably inaccurate upon review of the Amended Brief of

Respondent.

In short, a review of the Amended Brief of Respondent shows it complies in all respects with the South Carolina Appellate Court Rules, including Rule 211, SCACR, and the Motion should be denied.

**2. The Court Previously Rejected the Same or Similar Assertions.**

The Court previously rejected the same or similar arguments asserted by Appellant in the Motion in the Court's orders of October 23, 2024, January 31, 2025, May 22, 2025, and August 6, 2025. Despite the Court's noted prior orders, Appellant continues to file motions that appear, at this juncture, designed to delay the resolution of his appeal.

For the reasons discussed, the undersigned respectfully requests the Court consider whether the Motion meets the parameters of Rule 269, SCACR, and correspondingly, deny the Motion and order Appellant do the following: 1) prepare and file a final brief that complies with Rule 211(b), SCACR; 2) prepare and file a final brief that complies with the Court's prior orders dated October 23, 2024, January 31, 2025, May 22, 2025, and August 6, 2025; 3) file Appellant's final brief, including a bound copy of same as previously required, and the final record on appeal, including a bound copy of same as previously required; and 4) cease further motions related to either final briefs or the record on appeal. In the absence of an order requiring less, Respondent anticipates Appellant will continue to file motions to delay the Court resolving Appellant's appeal.

Respectfully submitted,

s/ Bob J. Conley

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Pro Se Appellant

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IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Honorable Jean H. Toal, Circuit Court Judge

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Appellate Case No. 2023-001733  
Case No. 2016-CP-10-06683

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

v.

Medical University of South Carolina, .....Respondent.

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**CERTIFICATE OF SERVICE**

Pursuant to Section (d)(1) of the Supreme Court’s Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), the undersigned counsel for the Respondent Medical University of South Carolina, does hereby certify that service of the **Return to Appellant’s Motion to Strike Final Response Brief** in the above-captioned matter was made upon Appellant by email and U. S. Mail on this 12<sup>th</sup> day of September 2025 as follows:

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s/ Bob J. Conley  
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