

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

76481

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Case No. 2011-CP-40-3642

Vernon L. McCullough,

Appellant

v.

South Carolina Dept. of
Corrections, Palmetto Health
d/b/a Palmetto Health
Richland, Jonathon David
Taylor, MD, Poorneema
Ramasamy, MD, William R.
Jennings, MD, William H.
Richardson, MD, and Jennifer
A. Adair, MD.

Respondents.

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SC Court of Appeals

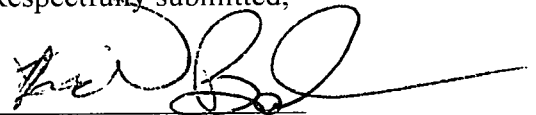
MOTION AND NOTICE OF APPEARANCE AND EXTENSION

Pursuant to Rule 240, SCACR, Appellant requests an extension of the deadline for filing his initial brief and designation of matter. Further, the Appellant would note for the record that Eric C. Hale, Esquire, of Law Office of Eric C. Hale, LLC, 125 Executive Pointe

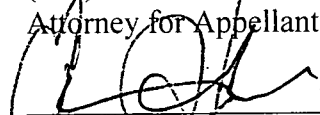
Boulevard, Columbia, SC 29210 hereby enters his appearance as co-counsel for Vernon McCullough in the above-captioned matter.

“Statutes and rules of courts should be construed liberally in favor of the right to appeal.” *Wieters v. Bon-Secours-St. Francis Xavier Hosp., Inc.* 378 S.C. 160, 167, 662 S.E.2d 430, 434 (Ct. App. 2008), *See also; Haughton v. Order of United Commercial Travelers of Am.*, 108 S.C. 73, 74–75, 93 S.E. 393, 394 (1917); *O'Rourke v. Atl. Paint Co.*, 91 S.C. 399, 403, 74 S.E. 930, 931 (1912). The Appellant respectfully requests this extension on the grounds that co-counsel has recently been added to assist in the appeal, and needs time to familiarize himself with the case and to prepare an initial brief to the satisfaction of himself and his client. Because this appeal comes from a decision in the favor of the Respondents, no party will be prejudiced by a grant of an extension.

Respectfully submitted,



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Attorney for Appellant

November 22, 2013

Columbia, SC 29205

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion and Notice of Appearance and Extension on the Defendants by placing a copy of same in the United States mail with sufficient postage attached thereto and addressed as follows:

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November 22, 2013
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