

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

70481

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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Case No. 2011-CP-40-3642

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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.

**RECEIVED**  
NOV 25 2013  
**SC Court of Appeals**

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**MOTION AND NOTICE OF APPEARANCE AND EXTENSION**

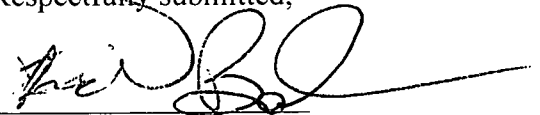
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Pursuant to Rule 240, SCACR, Appellant requests an extension of the deadline for filing his initial brief and designation of matter. Further, the Appellant would note for the record that Eric C. Hale, Esquire, of Law Office of Eric C. Hale, LLC, 125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

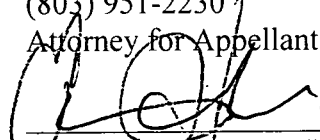
Boulevard, Columbia, SC 29210 hereby enters his appearance as co-counsel for Vernon McCullough in the above-captioned matter.

“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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Elias Fain, Esq.

November 22, 2013

Columbia, SC 29205

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**SC Court of Appeals**