

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Circuit Court Judge Jessica A. Salvini

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Case No. 2025-001433

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Ellise Cromwell,

Appellant,

v.

Medical University Hospital Authority and  
Medical University of South Carolina,

Respondents.

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**MOTION FOR EXTENSION OF TIME FOR RESPONDENTS TO FILE INITIAL  
BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD  
ON APPEAL**

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Respondents, through their undersigned counsel, hereby request an extension of time to file Respondents' initial brief and designation of matter for the record on appeal. Respondents' initial brief and designation of matter for the record on appeal are due Monday, April 6, 2026. Obligations of Respondent's counsel on other cases and other deadlines necessitate an extension of time for the undersigned firm to prepare Respondents' initial brief and designation of matter for the record on appeal.

For the reasons discussed, the undersigned respectfully requests an extension of time until Wednesday, May 6, 2026, to file Respondents' initial brief and designation of matter for

the record on appeal. Prior to filing this motion, Respondents' counsel consulted with counsel for Appellant, and Appellant does not oppose Respondents' request for the extension of time.

Respectfully submitted,

s/ Bob J. Conley

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126 Seven Farms Drive, Suite 200  
Charleston, South Carolina 29492  
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[bconley@cslaw.com](mailto:bconley@cslaw.com)

Attorney for Respondents

Charleston, South Carolina  
Date: April 1, 2026

Others of Record:

Donald Gist  
GIST LAW FIRM, PA  
Post Office Box 30007  
Columbia, South Carolina 29203  
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Attorney for Appellant

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**Apr 01 2026**

**SC Court of Appeals**

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**PROOF OF SERVICE OF MOTION FOR EXTENSION OF TIME FOR  
APPELLANT TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

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Bob J. Conley  
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Attorney for Respondents

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 Respondents, does hereby certify that service of the **Motion for Extension of Time for Respondents to File Initial Brief and Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon Appellant by email on this 1st day of April 2026 as follows:

Donald Gist  
GIST LAW FIRM, PA  
Post Office Box 30007  
Columbia, South Carolina 29203  
Telephone: (803) 771-8007  
[Donaldgist.gistlawfirm@gmail.com](mailto:Donaldgist.gistlawfirm@gmail.com)

Attorney for Appellant

s/Bob J. Conley  
Bob J. Conley, Esquire

Charleston, South Carolina  
Date: April 1, 2026



CLAWSON & STAUBES

BOB J. CONLEY  
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CHARLESTON, SC 29492  
(843) 577-2026

April 1, 2026

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Apr 01 2026

SC Court of Appeals

**Via Email Only**

The Honorable Jenny Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Re: *Elise Cromwell v. Medical University Hospital Authority and Medical University  
of South Carolina*  
No.: 2025-001433

Dear Ms. Kitchings:

Enclosed for filing is a Motion for Extension of Time for Respondents to File Initial Brief and Designation of Matter to be Included in Record on Appeal. Also enclosed is the related Proof of Service.

A check for the filing fee of \$50.00 is being sent separately by mail.

Sincerely,

CLAWSON & STAUBES, LLC

s/ Bob J. Conley  
Bob J. Conley

BJC/md

Enclosure: as stated

cc: Don Gist, Esquire