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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable R. Markley Dennis, Jr.  
Circuit Court Judge

**RECEIVED**  
JUL 28 2015  
SC Court of Appeals

Appellate Case No.: 2015-001463  
Case No.: 2011-CP-10-8318

Clair Craver Johnson .....Appellant

v.

John Roberts, M.D. .... Respondent

And

Clair Craver Johnson .....Appellant

v.

Medical University of South Carolina .....Respondent

**MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF,  
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON  
APPEAL, AND PROOF OF SERVICE THEREOF, AND TO HOLD FILING  
DEADLINES IN ABEYANCE UNTIL THE COURT ISSUES AN ORDER  
DECIDING THE MOTION OF THE MERITS**

Appellant Clair Craver Johnson hereby moves for an extension of time for filing its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof, on the Respondents in the above-referenced case. Respondents' Order Granting Defendants' Motions for Summary Judgment was served by mail on Appellant's counsel on February 5, 2014 and Appellant received Court's Order Granting

Defendants' Motions for Summary Judgment in these consolidated actions on or about February 7, 2015. Appellant filed Rule 59(e) Motions for Reconsideration in these consolidated cases by U.S. Mail dated February 14, 2014, which were denied by Orders dated May 26, 2015 served by U.S. Mail on June 2, 2015. Appellant filed its Notices of Appeal in these consolidated actions on July 2, 2015. Due to time limitations, counsel for Appellant respectfully requests additional time to complete the service and filing its Initial Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service. Counsel for Appellant requests a thirty (30) day extension of time such that the service and filing of its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof would be due on Thursday, August 27, 2015. While this motion is pending, Appellant requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Appellant's counsel has conferred with counsel for Respondent John Roberts, M.D. who have consented to the extension. Appellant's counsel has been unable to contact counsel for Respondent The Medical University of South Carolina, as of this writing.

July 28, 2015  
Columbia, South Carolina

  
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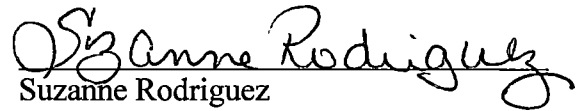
Medical University of South Carolina .....Respondent

**PROOF OF SERVICE**

I, Suzanne Rodriguez, Legal Assistant to D. Cravens Ravenel, an employee of Baker, Ravenel & Bender, L.L.P., attorneys for Clair Craver Johnson, hereby certify that I have, on this 28<sup>th</sup> day of July 2015, served counsel below with a Motion for Extension to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service Thereof, and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion of the Merits by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following addresses:

James Edward Scott, IV, Esquire  
Donald Jay Davis, Jr., Esquire  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402

William Peele Early, Esquire  
Pierce Herms Sloan & McLeod, LLC  
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Suzanne Rodriguez



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JUL 28 2015

**BAKER RAVENEL BENDER**

ATTORNEYS AT LAW

**SC Court of Appeals**

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(803) 343-3861- direct dial

July 28, 2015

**HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: Clair Craver Johnson, Appellant v. John Roberts M.D., Respondent  
And  
Clair Craver Johnson, Appellant v. Medical University of South Carolina,  
Respondent  
Appellate Case No.: 2015-001463  
Our File No.: 10517.2

Dear Ms. Kitchings:

Enclosed herein please find the original and seven (7) copies of Motion for Extension to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof, and to hold filing deadlines in abeyance until the Court issues an order deciding the motion of the merits. I am enclosing our firm's check in the amount of \$25.00 to cover the filing fee. Finally, I am enclosing an extra copy of each, which I would appreciate your clocking in and returning to me via the courier delivering same.

By copy of this correspondence to the Court, I am serving same upon counsel of record.

Thank you very much.

Sincerely,

D. Cravens Ravenel

DCR:sr; Enclosure

cc w/Encl.: William Peele Early, Esquire  
James Edward Scott, IV, Esquire  
Donald Jay Davis, Jr., Esquire  
Clair Craver Johnson