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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**  
AUG 12 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

**APPELLANT'S SECOND 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 a second extension of time for filing her 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. By order filed July 30, 2015, this Court has previously granted Appellant a thirty (30) day extension of time for serving and filing the appellant's initial brief and designation of matter and

setting the deadline to August 27, 2015.

Counsel for Appellant respectfully requests an additional thirty (30) day extension to complete the service and filing her Initial Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service for the reason that counsel has a date-certain trial in a complicated medical malpractice action (Case no. 2013-CP-29-1339, Johnnie Mae Reed, as personal representative of the Estate of Sandra Gilbert, Plaintiff, vs. Carenet, Inc. of Lancaster and Nimal A. Perera, M.D. Defendants) starting on August 24, 2015 and expected to last the entire week. This date-certain trial required more preparation than originally anticipated. Additionally, counsel's attention has been required during this same time by voluminous discovery that had to be dealt with in other pending cases. Consequently, counsel for Appellant has been unable to complete Appellant's Initial Brief and Designation of Matter.

Counsel for Appellant respectfully requests this additional time to complete the service and filing of her Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof, such that they would be due on Monday, September 28, 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. and with counsel for Respondent The Medical University of South Carolina and they have consented to this second extension.

[signature on the following page]

D. Cravens Ravenel

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[cravenel@brblegal.com](mailto:cravenel@brblegal.com) File No.: 10517.2  
*Attorneys for Plaintiff*

August 12, 2015  
Columbia, South Carolina

Other Counsel of Record:

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*Attorneys for The Medical University of South Carolina*

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**PROOF OF SERVICE**

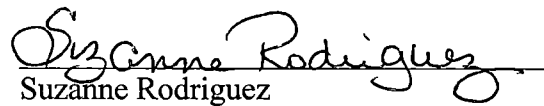
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I, Suzanne Rodriguez, Legal Assistant to D. Cravens Ravenel, an employee of Baker, Ravenel & Bender, L.L.P., attorneys for Clair Craver Johnson, hereby certify that I have, on this 12<sup>th</sup> day of August 2015, served counsel below with Appellant's Second 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 on 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:

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Charleston, SC 29413

  
Suzanne Rodriguez



BAKER RAVENEL BENDER  
ATTORNEYS AT LAW

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AUG 12 2015

SC Court of Appeals

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(803) 343-3861 - direct dial

August 12, 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 Appellant's Second 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 on the merits. I am enclosing an extra copy of each, which I would appreciate your clocking in and returning to me via the courier delivering same. Also enclosed is our firm's check in the amount of \$25 to cover the filing fee.

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  
Perry McPherson Buckner, IV, Esquire  
Clair Craver Johnson