

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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NOV 30 2015

Appeal from Charleston County  
Court of Common Pleas

**SC Court of Appeals**

Deadra L. Jefferson, Circuit Court Judge  
R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2015-001463  
Case No. 2012-CP-10-02867; 2011-CP-10-08318

Clair Craver Johnson,

Appellant,

v.

John Roberts, M.D.,

Respondent.

And

Clair Craver Johnson,

Appellant,

v.

Medical University of South Carolina,

Respondent.

**MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE  
INITIAL BRIEF OF RESPONDENT JOHN ROBERTS, M.D.**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
D. Jay Davis, Jr.  
James E. Scott, IV  
Russell G. Hines  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for John Roberts, M.D.*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA  
COURT OF APPEALS

COMES NOW Respondent John Roberts, M.D., by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and moves this Honorable Court for an additional extension of thirty (30) days' time to file/serve his initial respondent's brief and corresponding designation of matter to be included in the record on appeal.

Appellant Clair Craver Johnson served her initial brief on September 28, 2015; thereby, making the Respondents' initial briefing deadline October 28, 2015, according to Rule 208(a)(2), SCACR. Previously, via letter request, Respondent John Roberts, M.D., sought a 30-day extension of his briefing deadline, i.e., an extension of this deadline through November 30, 2015. This motion has not yet been acted upon by the Court.

In light of other time commitments, the undersigned respectfully requests that this Respondent's deadline for filing/serving his initial brief and corresponding designation of matter to be included in the record on appeal be extended by 30 days from November 30, 2015, i.e., through December 30, 2015. Respectfully, Respondent John Roberts, M.D., believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondent John Roberts, M.D., respectfully requests

that this Honorable Court grant him an additional extension of 30 days' time to file/serve his initial respondent's brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving this Respondent's initial brief and designation of matter would be December 30, 2015, according to the undersigned's calculations. Further, this Respondent respectfully requests that the Court hold his present deadline for briefing/designating matter in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By. 

Stephen L. Brown

D. Jay Davis, Jr.

James E. Scott, IV

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Charleston, SC 29401

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*Attorneys for John Roberts, M.D.*

Charleston, South Carolina

Dated: 11/30/15

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**PROOF OF SERVICE**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
D. Jay Davis, Jr.  
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(843) 720-5488  
*Attorneys for John Roberts, M.D.*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondent above named, do hereby certify that I have served the **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT JOHN ROBERTS, M.D.** on all parties of record by depositing a copy of the same in the United States Mail, postage prepaid, on November 30, 2015, addressed as follows to their counsel of record:

D. Cravens Ravenel, Esquire  
Baker, Ravenel & Bender, L.L.P.  
P.O. Box 8057  
Columbia, SC 29202

*Attorney for Clair Craver Johnson*

*-and-*

William P. Early, Esquire  
Pierce, Hems, Sloan & McLeod, LLC  
P.O. Box 22437  
Charleston, SC 29401

*Attorney for Medical University of South Carolina*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

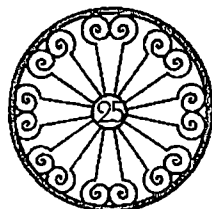
By: 

Russell G. Hines

*Attorneys for John Roberts, M.D.*

Charleston, South Carolina

Dated: 11/30/15



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Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

November 30, 2015

**VIA US MAIL AND FACSIMILE**

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

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NOV 30 2015

SC Court of Appeals

Re: Clair Craver Johnson vs. John Roberts, M.D.  
Clair Craver Johnson vs. Medical University of South Carolina  
Appellate Case No. 2015-001463  
Case No.: 2012-CP-10-2867  
YCR File: 2466-20111027

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of the Motion for Second Extension of Time to File/Serve Initial Brief of Respondent John Roberts, M.D., the original and one copy of the Proof of Service of same and our firm's check in the amount of \$25.00. Please file the originals and return court-stamped copies to me in the envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

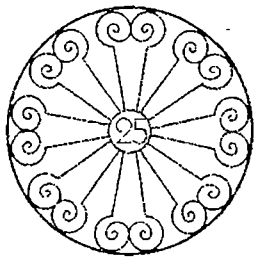
Kathleen B. Barnes  
Secretary

/kbb

Enclosures

(via US Mail and email)

cc: D. Cravens Ravenel, Esquire, Baker, Ravenel & Bender, L.L.P.  
William P. Early, Esquire, Pierce, Hems, Sloan & McLeod, LLC



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Date: November 30, 02:53:37 PM EST  
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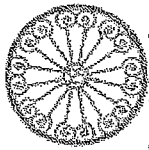
SC Court of Appeals

Dear Ms. Kitchings,

Attached please find correspondence in the above-referenced matter. The originals have been placed in the mail. Please let us know if you have any questions or need anything further.

Thank you!

Katy B. Barnes  
Commercial Litigation Secretary  
Stephen L. Brown, Russell G. Hines & Joanna B. Stroud  
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