

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

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

FEB 03 2016

SC Court of Appeals

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

Clair Craver JohnsonAppellant

v.

John Roberts, M.D. Respondent

And

Clair Craver JohnsonAppellant

v.

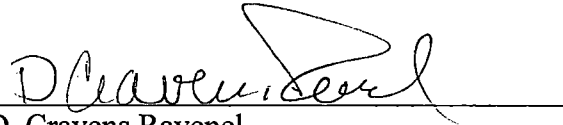
Medical University of South CarolinaRespondent

**APPELLANT'S NOTICE OF MOTION AND MOTION FOR
A THIRTY (30) DAY EXTENSION OF TIME IN WHICH
TO FILE THE RECORD ON APPEAL**

Appellant moves the Court for an order extending Appellant's time to file the Record on Appeal on the grounds that Appellant is unable to locate portions of the file that both Appellant and Respondents have designated as part of the Record on Appeal and Appellant needs an additional thirty (30) days in which to locate these documents and print same as part of the designated Record on Appeal.

As extended, Appellant will have until February 29, 2016 in which to file and

serve the Record on Appeal. Appellant represents that he has discussed this request with counsel for Respondents and both consent to the request and have agreed to provide those portions of the proposed Record on Appeal to Appellant in order to comply with this extension if granted.



D. Cravens Ravenel
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091; Fax (803) 779-3423
cravenel@brblegal.com File No.: 10517.2
Attorneys for Plaintiff

February 3, 2016
Columbia, South Carolina

COUNSEL OF RECORD

Stephen L. Brown, Esquire
Donald Jay Davis, Jr., Esquire
James Edward Scott, IV, Esquire
Russell G. Hines, Esquire
Perry McPherson Buckner, IV, Esquire
Young Clement Rivers, LLP
25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402
Phone: (843) 720-5406
jdavis@ycrlaw.com; jscott@ycrlaw.com;
sbrown@ycrlaw.com; rhines@ycrlaw.com
Attorneys for John Roberts, M.D.

William Peele Early, Esquire
Kristen B. Fehsenfeld, Esquire
Pierce Hems Sloan & Wilson, LLC
P.O. Box 22437
Charleston, SC 29402
Phone (843) 722-7733; Fax: (843) 722-7732
Email: willearly@phsm.net
*Attorneys for The Medical University of
South Carolina*

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

FEB 03 2016

SC Court of Appeals

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

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

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 3rd day of February 2016, served counsel below with Appellant's Notice of Motion and Motion for a Thirty (30) Day Extension of Time in Which to File the Record On Appeal 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:

Stephen L. Brown, Esquire
Donald Jay Davis, Jr., Esquire
James Edward Scott, IV, Esquire
Russell G. Hines, Esquire
Perry McPherson Buckner, IV, Esquire
Young Clement Rivers, LLP
25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402

William Peele Early, Esquire
Kristen B. Fehsenfeld, Esquire
Pierce Herms Sloan & Wilson, LLC
P.O. Box 22437
Charleston, SC 29402


Suzanne Rodriguez



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

- D. Cravens Ravenel
cravenel@brblegal.com
(803) 343-3861- direct dial

February 3, 2016

HAND DELIVERY and
E-Mail jkitchings@sccourts.org
The Honorable Jenny Abbott Kitchings
ATTN: V. Claire Allen, Deputy Clerk
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RECEIVED

FEB 03 2016

SC Court of Appeals

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. Allen:

I enclose and serve upon the Court the original and seven (7) copies of the Notice of Motion and Motion to extend by thirty (30) days the time by which the Record on Appeal must be filed in these consolidated cases. I represent the Appellant in these consolidated cases and have had difficulty locating portions of the file designated by me and by Respondents as part of the Record on Appeal.

Counsel for both John Roberts, M.D. and the Medical University of South Carolina have consented to this extension and have agreed to assist me in locating the records I have been unable to locate. When I talked to you I sought a fifteen (15) day extension but realistically given the documents I need to obtain from the Respondents I will need a thirty (30) day extension, if possible.

I am sending this to you by e-mail and will hand deliver it today with the \$25.00 check for the fee require.

Sincerely yours,

D. Cravens Ravenel
DCR:sr
Enclosure

cc w/Encl.:

COUNSEL OF RECORD:

Stephen L. Brown, Esquire
Donald Jay Davis, Jr., Esquire
James Edward Scott, IV, Esquire
Russell G. Hines, Esquire
Perry McPherson Buckner, IV, Esquire
Young Clement Rivers, LLP
25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402
Phone: (843) 720-5406
jdavis@ycrlaw.com; jscott@ycrlaw.com;
sbrown@ycrlaw.com; rhines@ycrlaw.com
Attorneys for John Roberts, M.D.

William.Peele Early, Esquire
Kristen B. Fehsenfeld, Esquire
Pierce Hems Sloan & Wilson, LLC
P.O. Box 22437
Charleston, SC 29402
Phone (843) 722-7733; Fax: (843) 722-7732
Email: willearly@phsm.net
Attorneys for The Medical University of South Carolina