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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

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APR 06 2016

SC Court of Appeals

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

Clair Craver Johnson.....Appellant

v.

The Medical University of South Carolina.....Respondent

Case No. 2012-CP-10-2867

Clair Craver Johnson.....Appellant

v.

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

MOTION FOR EXTENSION OF TIME TO FILE FINAL RESPONDENT'S BRIEF

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Respondent, the Medical University of South Carolina (“MUSC”), hereby moves for an extension of time to file and serve Respondent’s final brief pending receipt of Vol. III of the Record on Appeal, to be supplemented by Appellant pursuant to the parties Joint Motion to Supplement the Record on Appeal.

On March 16, 2016, Respondent MUSC received a copy of Appellant’s Record on Appeal, consisting of 535 pages and spanning two volumes. When Respondent designated its Motion for Summary Judgment to be incorporated in the Record on Appeal it presumed that the supporting memorandum and all referenced exhibits were likewise included. However, upon review of the Record, it was discovered that exhibits D through G to the Memorandum in Support were missing (while Exhibits A through C were included). Respondent immediately conferred with Appellant and both agreed that the omission was inadvertent and due to administrative error. A Joint Motion to Supplement the Record on Appeal was subsequently filed on March 29, 2016.

Respondent’s final brief is presently due to be filed and served on April 4, 2016. However, because the omitted exhibits referenced above are cited in Respondent’s Brief at pages 11 and 12, the final brief cannot be finalized until the Supplemental Record is prepared and received by Respondent. Consequently, Respondent MUSC respectfully requests an extension of seven days from receipt of the Supplemental Record to file and serve its final Respondent’s brief.

-- Signature page to follow --

Respectfully submitted,



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April 1, 2016

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In the Court of Appeals

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Circuit Court Judge

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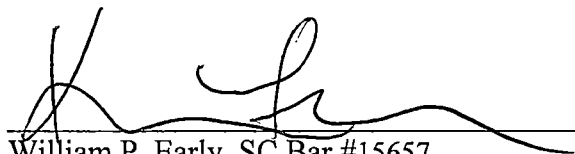
John Roberts, M.D.....Respondent

PROOF OF SERVICE

I certify that on the 1st day of April, 2016, I served a copy of Respondent MUSC's Motion for Extension of Time to File Final Respondent's Brief to counsel of record 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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April 1, 2016

APR 06 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Clair Craver Johnson, Appellant v. Medical University of South Carolina,
Respondent
AND
Clair Craver Johnson, Appellant v. John Roberts, M.D., Respondent
Appellate Case No. 2015-001463
Our File Number: D2286.00

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter is an original and one copy of Respondent's Plaintiff's Motion for Extension to file Final Respondent's Brief, along with the required motion fee, in regard to the above-referenced matter.

By copy of this letter and enclosure, I am serving all counsel with same.

With kind regards,

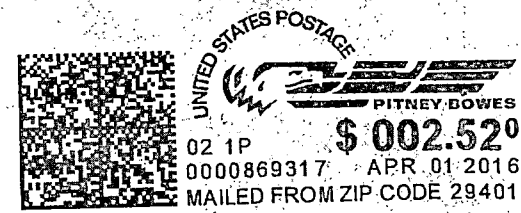
Sincerely,



Kristen B. Fehsenfeld

KBF/mkg

cc: D. Cravens Ravenel, Esquire
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Court of Appeals

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P2546.00

