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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

MAY 31 2016

R. Markley Dennis, Jr., Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-001331

Jack Powell Appellant

v:

The Medical University of South Carolina Respondent

RESPONDENT'S MOTION FOR FIRST EXTENSION OF TIME TO FILE AND SERVE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER FOR
INCLUSION IN THE RECORD ON APPEAL

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288 Meeting Street, Suite 200 29401)
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Charleston, SC 29402
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jjones@barnwell-whaley.com
Attorney for Respondent

Pro Se Appellant
Jack Powell
1402 8-A Camp Road
Charleston, SC 29412
(843) 952-4762
Appellant, pro se

Comes now the Respondent, The Medical University of South Carolina ("MUSC")(hereinafter "Respondent") and respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR for a thirty (30) day extension of time in which to file and serve its Initial Brief and Designation of Matter for Inclusion in the Record on Appeal. This motion is not made for the purpose of undue delay. Counsel for the Respondent has attempted to contact *pro se* Appellant, to no avail.

Accordingly, Respondent requests an Order extending the time to file and serve its Initial Brief and Designation of Matter for Inclusion in the Record on Appeal by thirty (30) days, or until June 30, 2016.

May 27, 2016

BARNWELL WHALEY PATTERSON
& HELMS, LLC

By:



Jay A. Jones
Barnwell Whaley Patterson & Helms, LLC
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SC Court of Appeals

Jack Powell Appellant

v.

Medical University of South Carolina Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent's First Extension of Time to File and Serve Respondent's Initial Brief and Designation of Matter for Inclusion in the Record on Appeal on the above-referenced *pro se* Appellant by depositing a copy of it in the United States Mail, postage prepaid, on May 27, 2016, addressed as follows:

Jack Powell
1402 8-A Camp Road
Charleston, SC 29412
(843) 952-4762

BARNWELL WHALEY PATTERSON
& HELMS, LLC

By: _____


Jay A. Jones
Barnwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200 (29401)
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Charleston, SC 29402
Tel: (843) 577-7700 Fax: (843) 577-7708



John A. Jones, Esquire
jjones@barnwell-whaley.com

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MAY 31 2016

SC Court of Appeals

May 27, 2016

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

RE: Jack Powell v MUSC
Appellate Case No. 2015-001331
BWPH File No.: 1.555

Dear Ms. Kitchings,

I am the attorney representing Respondent, The Medical University of South Carolina, in the above-referenced matter. Jack Powell, Appellant *pro se*, served his Designation of Matter for Inclusion on the Record on April 30, 2016, making Respondent's initial brief due on or before May 31, 2016. Respondent respectfully requests a 30-day extension, until June 30, 2016, to file its Initial Brief and Designation of Matter.

Enclosed please find the original and six (6) copies of Respondent's Motion for First Extension of Time to File and Serve Respondent's Initial Brief and Designation of Matter for Inclusion in the Record on Appeal. I am enclosing our check in the amount of \$25.00 for the filing fee. By copy of this letter to him, I am serving a copy of this Motion upon *pro se* Appellant, Jack Powell.

Sincerely,

John A. Jones

JAJ/jgc
Enclosure

cc: Jack Powell

www.barnwell-whaley.com

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE



1,555

**BARNWELL
WHALEY**
PATTERSON & HELMS LLC

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YEARS
1938-2013

P.O. Drawer H, Charleston, SC 29402-0197

1,555
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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