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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Circuit Court Judge

Appellate Case No. 2016-001986

RECEIVED
FEB 21 2017
SC Court of Appeals

Shon Turner as Personal Representative
of the Estate of Charles Mikell, deceased, Appellant

v.

The Medical University of South Carolina Respondent

APPELLANT'S MOTION FOR EXTENSION OF TIME

The transcript of the trial below was received by Appellant's counsel on February 1, 2017, making the Appellant's Initial Brief and Designation of Matter to Be Included in the Record on Appeal due on or before March 3, 2017. This particular case involves an appeal from certain rulings during the trial below (Appellate Case No. 2016-001986); as well as an appeal and a cross-appeal from an order imposing discovery sanctions (Appellate Case No. 2016-002326). The transcript of the lower court proceedings exceeds 1,400 pages.

Appellant's counsel is a solo practitioner who is scheduled for a date certain jury trial beginning on February 27, 2017. Appellant's counsel is also scheduled to be overseas and away from his office during the last two weeks of March, 2017. Appellant therefore moves for a sixty (60) day extension of time in which to file and serve the Appellant's initial brief and designation in Appellate



Case No. 2016-001986. If granted, this extension will create May 2, 2017 as the new deadline for these filings.

Appellant's counsel has conferred with M. Dawes Cooke, Jr., counsel for the Respondent, and Mr. Cooke kindly consents to the extension of time sought hereby.

February 17, 2017

By: Robert B. Ransom

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ATTORNEY FOR THE APPELLANT

Other counsel of record:

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ATTORNEYS FOR THE RESPONDENT

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Circuit Court Judge

Case No. 2012-CP-10-7275

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SC Court of Appeals

Shon Turner as Personal Representative
of the Estate of Charles Mikell, deceased, Appellant

v.

The Medical University of South Carolina Respondent

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time on the Medical University of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on February 17, 2017, addressed to its attorney of record, M. Dawes Cook, Jr., Post Office Drawer H, Charleston, South Carolina 29402

February 17, 2017

By: Robert B. Ransom

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February 17, 2017

Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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Re: Shon Turner v. MUSC
Appellate Case No. 2016-001986

FEB 21 2017

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed in regard to the above-referenced appeal, please find the original and seven (7) copies of the Appellant's Motion for Extension of Time and accompanying Proof of Service, along with my office check for the \$25.00 filing fee.

Would you please return one of the file-stamped copies to me using the enclosed self-addressed, stamped envelope?

Thank you for your attention to this matter. Please call me if you have any questions or comments.

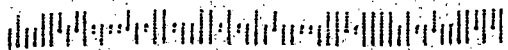
Very truly yours,



Robert B. Ransom

c: M. Dawes Cooke, Jr., Esq.
Alex Apostolou, Esq.

Leventis & Ransom
Post Office Box 11067
Columbia, SC 29211



COLUMBIA SC 292

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SC Court of Appeals

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