

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

APR 24 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 SECOND MOTION FOR EXTENSION OF TIME

Through the Court's Order of February 22, 2017, the time for the Appellant Shon Turner to serve and file his initial brief and designation of matter was extended until May 2, 2017. Counsel for the Appellant Shon Turner hereby seeks an additional two (2) week extension of time for the initial brief and designation, which would make May 16, 2017 the new deadline.

This motion is made in consequence of the April 13, 2017 death of James J. Leventis, Esq., who was a founding member of the Leventis & Ransom law firm. Mr. Leventis passed away suddenly, leaving three minor children as survivors, along with an active criminal law practice. Mr. Ransom has been appointed Personal Representative of Mr. Leventis' estate and is assisting in the orderly disposition of Mr. Leventis' inventory of pending cases. These activities, and the grieving process, have necessarily interfered with Mr. Ransom's work on this appeal.



Mr. Ransom has conferred with M. Dawes Cooke, Jr., counsel for the Respondent, and Mr.

Cooke kindly consents to the extension of time sought hereby.

April 24, 2017

By: Robert B. Ransom

Robert B. Ransom
LEVENTIS & RANSOM
Post Office Box 11067
Columbia, SC 29211
(803) 765-2383
ATTORNEY FOR THE APPELLANT

Other counsel of record:

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Alissa Fleming
BARNWELL, WHALEY, PATTERSON & HELMS
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Charleston, SC 29402
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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 Second 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 April 24, 2017, addressed to its attorney of record, M. Dawes Cook, Jr., Post Office Drawer H, Charleston, South Carolina 29402.

April 24, 2017

By:

Robert B. Ransom

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Attorney for the Appellant

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April 24, 2017

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

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SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed in regard to the above-referenced appeal, please find the original and seven (7) copies of the Appellant's Second 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.

Dear Ms. Kitchings:

Enclosed in regard to the above-referenced appeal, please find the original and seven (7) copies of the Appellant's Second 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?

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