

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In the Court of Common Pleas for the Ninth Circuit

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2016-001986

RECEIVED

JUN 13 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

RESPONDENT THE MEDICAL UNIVERSITY OF SOUTH CAROLINA'S CONSENT
MOTION OF TIME TO SERVE AND FILE INITIAL RESPONDENT'S BRIEF AND
DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL

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Charles Mikell, Deceased*

AND NOW COMES Respondent The Medical University of South Carolina ("MUSC and files the following Consent Motion for Extension of Time to Serve and File Initial Respondent's Reply Brief and Designation of Matter for Inclusion in the Record on Appeal:

1. Appellant filed and served his Initial Appellant's Brief on May 16, 2017.
2. As a result, pursuant to S.C.R.A.P., Rule 208(a)(2), MUSC's Initial Respondent's Brief and Designation of Matter for the Record on Appeal are due on June 15, 2017.
3. In order to have time to sufficiently prepare a response, Respondent MUSC respectfully requests a fourteen (14) day extension to serve and file its Initial Respondent's Brief and Designation of Matter for the Record on Appeal.
4. With the extension, Respondent MUSC's Initial Respondent's Brief and Designation of Matter for the Record on Appeal would then be due on June 29, 2017.
5. Respondent MUSC has not previously requested an extension of time to serve and file its Initial Respondent's Brief and Designation of Matter for the Record on Appeal.
6. Counsel for Appellant has graciously consented to the extension requested herein.

June 2, 2017

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By  f

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PROOF OF SERVICE

I certify that I have served the Respondent The Medical University of South Carolina's Consent Motion for Extension of Time to Serve and File Initial Respondent's Brief and Designation of Matter for Inclusion in the Record on Appeal on the above-referenced Appellant by depositing a copy of it in the United States Mail, postage prepaid, on June 12, 2017, addressed to his attorneys of record:

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of Charles Mikell, Deceased*

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John W. Fletcher, Esquire

June 12, 2017

RECEIVED

JUN 13 2017

SC Court of Appeals

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Shon Turner, as Personal Representative of the Estate of Charles Mikell, deceased,
vs. Medical University of South Carolina
Appellate No. 2016-001986
BWPH File No.: 1.554

Dear Ms. Kitchings,

Enclosed please find the original and seven (7) copies of Respondent The Medical University of South Carolina's **Consent Motion for Extension of Time to Serve and File Initial Respondent's Brief and Designation of Matter for Inclusion in the Record on Appeal** along with a Proof of Service of the same and check in the amount of Twenty-Five Dollars (\$25.00) for the filing fee. We would appreciate if you would file the original document and return a filed, stamped copy to us in the self-addressed, stamped envelope provided.

By copy of this letter, we are serving a copy of the Motion upon counsel of record.

Sincerely,

A handwritten signature in black ink, appearing to be "MDC", is written over a horizontal line.

M. Dawes Cooke, Jr.
Alissa D. Fleming
John W. Fletcher

MDCjr/ADF/JWF/jgc
Enclosures

cc: Robert B. Ransom, Esquire
Alex Apostolou, Esquire

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

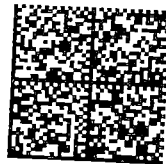
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BARNWELL
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JUN 12 2017

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