

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. 2016-002326

**RECEIVED**  
JUN 09 2017  
SC Court of Appeals

Shon Turner, as Personal Representative of the Estate of Charles  
Mikell, Deceased.....Respondent

v.

The Medical University of South Carolina.....Appellant

APPELLANT THE MEDICAL UNIVERSITY OF SOUTH CAROLINA'S CONSENT  
MOTION FOR EXTENSION OF TIME TO SERVE RECORD ON APPEAL

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***Attorneys for Respondent Shon Turner, as  
Personal Representative of the Estate of  
Charles Mikell, Deceased***

AND NOW COMES Appellant The Medical University of South Carolina ("MUSC") and files the following Consent Motion for Extension of Time to Serve Record on Appeal:

1. MUSC served its Initial Reply Brief, the last brief in this appeal, on May 15, 2017.
2. As a result, pursuant to the Rules of Appellate Procedure, MUSC is required to serve the Record on Appeal on or before June 14, 2017. *See* S.C.R.A.P., Rule 210(a) ("Within thirty (30) days after service of the last brief, the appellant shall serve a copy of the Record on Appeal on each party who has served a brief."): .
3. In order to have time to sufficiently prepare the Record on Appeal, MUSC respectfully requests a fourteen (14) day extension to serve the Record on Appeal in this matter.
4. With the extension, MUSC would be required to serve the Record on Appeal on or before June 28, 2017.
5. MUSC would then be required to file the Record on Appeal and the parties to file and serve their Final Briefs within 20 days after service of the Record on Appeal. *See* S.C.R.A.P., Rule 210(b) and 211(a).
6. MUSC has not previously requested an extension of time to serve the Record on Appeal.
7. MUSC believes that the requested extension will not unduly delay the disposition of this appeal or prejudice any party.

8. Counsel for Respondent Shon Turner, as Personal Representative of the Estate of Charles Mikell, Deceased has graciously consented to the requested extension.

June 8, 2017

BARNWELL WHALEY PATTERSON &  
HELMS, LLO

By: 

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*Attorneys for Appellant The Medical University  
of South Carolina*

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v.

The Medical University of South Carolina.....Appellant

PROOF OF SERVICE

I certify that I have served the Appellant The Medical University of South Carolina's Consent Motion for Extension of Time to Serve Record on Appeal on the above-referenced Respondent by depositing a copy of it in the United States Mail, postage prepaid, on June 8, 2017, addressed to his attorneys of record:

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*Attorneys for Respondent Shon Turner, as Personal Representative of the Estate of Charles Mikell, Deceased*

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**BARNWELL  
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Attorneys for businesses & professionals since 1938

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

June 8, 2017

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**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  
C/A No.: 2012-CP-10-7275  
Appellate No. 2016-002326  
BWPH File No.: 1.554

Dear Ms. Kitchings,

Enclosed please find the original and seven (7) copies of Appellant The Medical University of South Carolina's **Consent Motion for Extension of Time to Serve 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,



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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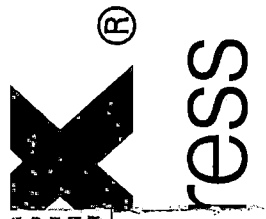
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