

83722

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

Appeal from Charleston County  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

**RECEIVED**

JUN 16 2017

SC Court of Appeals

Appellate Case No. 2015-001300  
Trial Court Case No. 2012-CP-10-03114

Charles E. Baker, Sr.,

Appellant,

v.

Medical University of South Carolina,

Respondent.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF AND DESIGNATION OF MATTER**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
James Edward Scott, IV (SC Bar No. 09063)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Counsel for Respondent*

✓

NOW COMES Respondent, Medical University of South Carolina, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and, on the grounds set forth below, hereby moves this Honorable Court for an additional extension of thirty (30) days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed May 25, 2017, the deadline for Respondent's initial brief and designation of matter is June 16, 2017. On account of work-related and other time commitments (including presently being on a long-standing family vacation as well as the upcoming 4<sup>th</sup> of July holiday), Respondent respectfully requests that this deadline be extended by 30 days (from June 16, 2017), i.e., through July 17, 2017.<sup>1</sup> Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondent moves for an extension of 30 days' time (from June 16, 2017) to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the requested extension, the deadline for filing/serving Respondent's initial brief and designation of matter would be July 17, 2017, according to the undersigned's calculations. Further, Respondent

---

<sup>1</sup> Calculating the 30-day period (from June 16, 2017) in accordance with Rule 263(a), SCACR, it runs until Monday, July 17, 2017, because the 30<sup>th</sup> day is Sunday, July 16, 2017.

respectfully requests that the Court hold this matter in abeyance until it acts upon this motion.

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By: Manly Willis *on behalf of*  
Russel G. Hines

Stephen L. Brown (SC Bar No. 66468)  
James Edward Scott, IV (SC Bar No. 09063)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Counsel for Respondent*

Charleston, South Carolina

Dated: 6/14/17

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

Appeal from Charleston County  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

---

Appellate Case No. 2015-001300  
Trial Court Case No. 2012-CP-10-03114

---

**RECEIVED**

JUN 16 2017

**SC Court of Appeals**

Charles E. Baker, Sr.,

Appellant,

v.

Medical University of South Carolina,

Respondent.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
James Edward Scott, IV (SC Bar No. 09063)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Counsel for Respondent*

I, Mary S. Willis, on behalf of Russell G. Hines of Young Clement Rivers, LLP, counsel for Respondent, Medical University of South Carolina, do hereby certify that I have served the foregoing **Respondent's Motion for Extension of Time to File/Serve Initial Brief and Designation of Matter** on all parties to this appeal, by depositing a copy of the same in the United States Mail, postage prepaid, on June 14, 2017, addressed as follows:

Charles E. Baker, Sr.  
P.O. Box 1803  
Folly Beach, SC 29439

*Appellant, Pro Se*

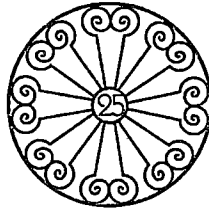
Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: Mary Willis  
Mary S. Willis (SC Bar No. 102411)  
*Counsel for Respondent*

Charleston, South Carolina

Dated: 6/14/17



# YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

June 14, 2017

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

JUN 16 2017

**SC Court of Appeals**

Re: Charles E. Baker, Sr. vs. Medical University of South Carolina  
Appellate Case No. 2015-001300  
Case No.: 2015-001300  
Claim No.: I.R.F. File No.: 84905  
YCR File: 2235-20120413

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent's Motion for Extension of Time to File/Serve Initial Brief and Designation of Matter, the original and one (1) copy of the Proof of Service for same and our firm's check in the amount of \$25.00 representing the filing fee. Please file the originals and return a file stamped copy of each to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes  
Secretary

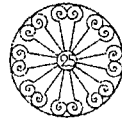
Enclosures

cc: Charles E. Baker, Sr.

Hasler FIRST-CLASS MAIL  
06/14/2017  
US POSTAGE \$002.03<sup>9</sup>

ZIP 29401  
011E12650687

**FIRST CLASS MAIL**

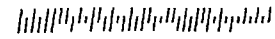


**YCRLAW**  
Young Clement Rivers, LLP

23 CALHOUN STREET, SUITE 400  
P.O. Box 993  
CHARLESTON, SC 29402

RGH  
2235-20120413

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211



**RECEIVED**

JUN 16 2017

SC Court of Appeals