

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

JUL 07 2017

SC Court of Appeals

83917

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
TO SERVE A REPLY BRIEF**

On June 29, 2017, counsel for the Respondent served a comprehensive Initial Respondent's Brief which is 48 pages in length. The ten (10) days allowed for the preparation of a Reply Brief by Rule 208(3), SCACR, is insufficient in this instance to enable Appellant's counsel to cogently respond to the many arguments and factual assertions contained in the Initial respondent's Brief. The Appellant therefore moves for an eight (8) day extension of time in which to serve an initial Reply Brief.

By counsel's calculation, the current deadline for serving a Reply Brief is July 10, 2017. The requested extension of time would set the new deadline on July 18, 2017. Counsel for the Respondent has graciously consented to this extension of time.

Dated: July 7, 2017

By: Robert B. Ransom

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ATTORNEY FOR THE APPELLANT

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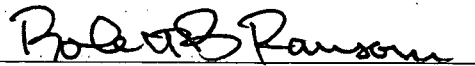
The Medical University of South Carolina Respondent

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to Serve a Reply Brief on the Medical University of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on July 7, 2017, addressed to its attorney of record, M. Dawes Cook, Jr., Post Office Drawer H, Charleston, South Carolina 29402.

July 7, 2017

By:



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July 7, 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 Motion for Extension of Time to Service a Reply Brief and accompanying Proof of Service, along with my office check for the \$25.00 filing fee.

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.