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

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FEB 22 2018

SC Court of Appeals

Appeal from Charleston County
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2015-001463

Circuit Court Case Nos. 2012-CP-10-2867 and 2011-CP-10-8313

Clair Craver Johnson,

Appellant,

v.

John Roberts, M.D.,

Respondent.

And

Clair Craver Johnson,

Appellant,

v.

Medical University of South Carolina,

Respondent.

MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James E. Scott, IV (SC Bar No. 69436)
Russell G. Hines (SC Bar No. 72100)
P.O. Box 993
Charleston, South Carolina 29402
843-720-5488
*Attorneys for Respondent
John Roberts, M.D.*

NOW COMES Respondent John Roberts, M.D. (“Dr. Roberts”), by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and, on the grounds set forth below, hereby moves this Honorable Court for an extension of fifteen (15) days’ time to petition for rehearing of this matter, which the Court decided via opinion filed February 7, 2018. *See Johnson v. Roberts*, Op. No. 5535 (S.C. Ct. App. filed February 7, 2018) (Shearhouse Adv. Sh. No. 6 at 72).

1. Rule 221(a), SCACR, provides, “Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court.”

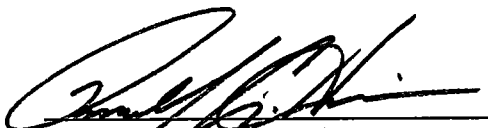
2. Based on the February 7, 2018, filing date of the Court’s opinion, the present deadline to petition for rehearing of this matter is the close of business tomorrow, Thursday, February 22, 2018, which, pursuant to Rule 263(a), SCACR (regarding computation of time), will be the 15th day after the filing of the opinion.

3. On account of work-related and other time commitments, the undersigned requests that the present deadline to petition for rehearing be extended by 15 days, i.e., from Thursday, February 22, 2018, to Friday, March 9, 2018.

4. The undersigned submits that, under the circumstances, there exists good cause for the Court to grant the relief requested herein, such relief constituting a reasonable dispensation, timely sought, consistent with the interests of justice, and posing no threat of undue prejudice to any other party.

WHEREFORE, Dr. Roberts requests that the Court grant a 15-day extension of the deadline to petition for rehearing in this matter, i.e., an extension of the deadline to petition for rehearing to March 9, 2018. ADDITIONALLY, Dr. Roberts requests that the Court hold the present deadline to petition for rehearing in abeyance (and not send down the remittitur) until the Court acts on this motion.

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James E. Scott, IV (SC Bar No. 69436)
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843-720-5488
*Attorneys for Respondent
John Roberts, M.D.*

Charleston, South Carolina

Dated: 2/21/18

**THE STATE OF SOUTH CAROLINA
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Clair Craver Johnson,	Appellant,
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PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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P.O. Box 993
Charleston, South Carolina 29402
843-720-5488
*Attorneys for Respondent
John Roberts, M.D.*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondent John Roberts, M.D., hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on February 21, 2018, properly posted for delivery to the following addressees:

Johnathan Blake Asbill, Esquire
Baker Ravenel & Bender, LLP
P.O. Box 8057
Columbia, SC 29202

and

Bradley Lewis Lanford, Esquire
The Law Office of Kenneth E. Berger, LLC
5205 Forest Drive, Suite 2
Columbia, SC 29206
*Attorneys for Appellant
Clair Craver Johnson*

William Peele Early, Esquire
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Charleston, SC 29413

*Attorneys for Respondent
MUSC*

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

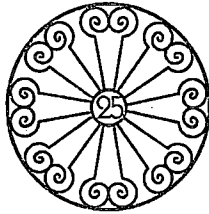
By: 

Russell G. Hines (SC Bar No. 72100)

*Attorneys for Respondent
John Roberts, M.D.*

Charleston, South Carolina

Dated: 2/21/18



YCR LAW

Kathleen B. Barnes
Secretary

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February 21, 2018

VIA FED EX OVERNIGHT, US MAIL AND FASCIMILE

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

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SC Court of Appeals

Re: Clair Craver Johnson vs. John Roberts, M.D.
Clair Craver Johnson vs. Medical University of South Carolina
Appellate Case No. 2015-001463
Case No.: 2012-CP-10-2867
YCR File: 2466-20111027

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to Petition for Rehearing, the original and one (1) copy of the Proof of Service for same and our firm's check in the amount of \$25.00 to cover the filing fee.

Please file the originals and return a court-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

(all via US Mail and email)

cc: Jonathan Blake Asbill, Esquire, Baker Ravenel & Bender, LLP
William Peele Early, Esquire, Pierce, Hens, Sloan & Wilson, LLC
Bradley Lewis Landford, Esquire, The Law Office of Kenneth E. Berger, LLC

✓