

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Bentley H. Price, Circuit Court Judge

Case No. 2018-CP-10-4377

Christine Nelson,

Respondent,

v.

Medical University Hospital Authority,

Appellant.

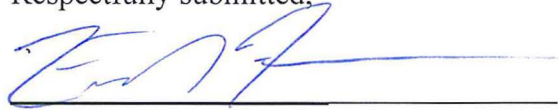
RECEIVED
Aug 24 2020
SC Court of Appeals

**MOTION FOR FIRST EXTENSION OF TIME TO FILE APPELLANT'S INITIAL
BRIEF AND DESIGNATION OF MATTER**

Appellant, Medical University Hospital Authority, through its undersigned counsel, hereby requests this Honorable Court extend the time for Appellant to file its Initial Brief and Designation of Matter in the above-referenced matter. The undersigned's office received the Transcript of the Record from the Circuit Court Reporter, Phyllis A. Norton, on June 9, 2020. Pursuant to Rules 208 and 209, SCACR, the current deadline for Appellant to file its Initial Brief and Designation of Matter is Thursday, September 17, 2020. Obligations of Appellant's counsel necessitate an extension of time in order for undersigned counsel to prepare Appellant's Initial Brief and Designation of Matter. The undersigned certifies he communicated with Respondent's counsel who consents to this Motion.

For the reasons discussed, Appellant requests the Court extend the deadline for Appellant to file its Initial Brief and Designation of Matter by thirty-five (35) days to Thursday, October 22, 2020.

Respectfully submitted,



Caroline Wrenn Cleveland (SC Bar #64253)
Bob J. Conley (SC Bar #12243)
Emmanuel J. Ferguson (SC Bar #81431)
CLEVELAND & CONLEY, L.L.C.
One Seventy-One Church Street, Suite 310
Charleston, South Carolina 29401
Telephone: (843) 577-9626
Facsimile: (843) 577-6672
ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com
eferguson@clevelandlaborlaw.com

Charleston, South Carolina
August 24, 2020

ATTORNEYS FOR APPELLANT

Other Counsel of Record:

Donald Gist
Aaron Wallace
GIST LAW FIRM, P.A.
P.O. Box 30007
Columbia, SC 29203
Telephone: (803) 771-8007
aaronwallace.gistlawfirm.yahoo.com
dtommygist@yahoo.com

ATTORNEYS FOR RESPONDENT

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Circuit Court Bentley Price

Case No. 2018-CP-10-4377

RECEIVED

Aug 24 2020

SC Court of Appeals

Christine Nelson,

Respondent,

v.

Medical University Hospital Authority,

Appellant.


**PROOF OF SERVICE OF MOTION FOR FIRST EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

Caroline Cleveland
Bob J. Conley
Emmanuel J. Ferguson
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
Telephone: (843)577-9626
ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com
eferguson@clevelandlaborlaw.com

ATTORNEYS FOR APPELLANT

I hereby certify that on this date, I served a copy of the Motion for First Extension of Time to File Appellant's Initial Brief and Designation of Matter to counsel for Respondent by placing a copy in the United States mail with sufficient postage thereon on to the following address:

Donald Gist
Aaron Wallace
GIST LAW FIRM, P.A.
P.O. Box 30007
Columbia, SC 29203



Emmanuel J. Ferguson, Esquire

Charleston, South Carolina

Date: August 24, 2020