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**Katon E. Dawson, Jr.**  
**Associate**  
t: 803.253.6854  
f: 803.255.8017  
katondawson@parkerpoe.com

Atlanta, GA  
Charleston, SC  
Charlotte, NC  
Columbia, SC  
Greenville, SC  
Raleigh, NC  
Spartanburg, SC  
Washington, DC

June 1, 2022

**Via E-mail [ctappfilings@sccourts.org] and Hand Delivery**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**

**JUN 01 2022**

**SC Court of Appeals**

Re: ***Medical University of South Carolina, et. al. v. HCA Healthcare, Inc., et. al.***  
**Case Number: 2022-000352**

Dear Mrs. Kitchings,

Respondents Trident Medical Center, Inc. and HCA Healthcare, Inc. ("Respondents") pursuant to 240(a), SCACR, respectfully request an extension of time of thirty (30) days within which to file their Initial Briefs and Designation of Matter to be included in the Record on Appeal.

This is Respondents' first request for an extension of time within which to file their Initial Briefs and Designation of Matter to be included in the Record on Appeal.

Presently, the Respondents' Initial Briefs and Designation of Matter to be included in the Record on Appeal must be filed with the Court on or before Monday, June 20, 2022. Therefore, Respondents are requesting an order granting an extension of thirty (30) days to file their Initial Briefs and Designation of Matter to be included in the Record on Appeal, up to and including Wednesday, July 20, 2022.

In regard to HCA Healthcare, Inc., this First Motion for Extension is made without waiving and expressly reserving the defense (and pending Motion to Dismiss) for lack of personal jurisdiction. See *Dunbar v. Vandermore*, 295 S.C. 493, 497, 369 S.E.2d 150, 152;53 (Ct. App. 1988) ("the Rules do not provide that the right to question jurisdiction over the person is waived by obtaining an extension of time"); see also 2A J. Moore & J. Lucas, *Moore's Federal Practice* § 12.12, at 12-93 to 12-94 (2d ed. 1987); 5 C. Wright & A. Miller, *Federal Practice and Procedure* § 1361, at 646 (1969).

Attached to this First Motion for Extension please find a copy of the Proof of Service. We have also enclosed a check in the amount of \$50.00 for the filing fee.

June 1, 2022  
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Sincerely,

A handwritten signature in blue ink, appearing to read "Katon E. Dawson, Jr." with a stylized flourish at the end.

Katon E. Dawson, Jr.

KED  
CC:  
CTJones@burr.com  
RWidener@burr.com  
JGilliam@burr.com