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Jun 17 2022

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge
Civil Action No. 2021-CP-21-02042

Appellate Case No. 2022-000729

Thomas Rodriquis NelsonRespondent,

v.

Florence Concrete Products, Inc.....Appellant.

APPELLANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE INITIAL
BRIEF AND DESIGNATION OF MATTER

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter to be included in the Record on Appeal in the above-captioned matter. This is the first request for an extension of this deadline.

Appellant’s counsel requests this extension to allow sufficient time to prepare Appellant’s Initial Brief. Appellant has communicated this request for an extension to Respondent’s counsel, Ashley Nance, who has consented to the extension and does not oppose it.

Appellant filed and served this Notice of Appeal on May 27, 2022; therefore, Appellant’s Initial Brief and Designation of Matter are due on June 27, 2022. With the additional thirty (30)

day extension, Appellant's Initial Brief and Designation of Matter will be due on July 27, 2022. Appellant requests that the current deadline of June 27th be held in abeyance pending the Court's consideration and resolution of this Motion.

Respectfully submitted this 17th day of June, 2022.

s/ Anthony W. Livoti
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Attorneys for Appellant

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PROOF OF SERVICE

The undersigned hereby certifies that on June 17, 2022, the foregoing Motion was served on all counsel of record in this action by mailing a copy of the Notice by United States Mail, postage prepaid, and electronic mail to the following addresses:

Counsel served: Ashley B. Nance, Esquire
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June 17, 2022

s/ Anthony W. Livoti

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Attorneys for Appellant

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SENT VIA EMAIL

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
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Re: Thomas Rodriquis Nelson vs. Florence Concrete Products, Inc.
Appellate Case No.: 2022-000729
Our File No.: 1980-0102

Dear Ms. Kitchings:

Attached for filing is Appellant's Motion for an Extension to File its Initial Brief and Designation of Matter and Proof of Service.

Thank you for your attention to this matter.

Very truly yours,

s/ Cordes B. Kennedy

Cordes B. Kennedy

CBK

Enclosure

cc: All counsel of record (*sent via email only*)