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Jul 19 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas
Bentley D. Price, Judge

Appellate Case No. 2022-00141

Jacob Murdaugh.....Appellant,

v.

Walmart Stores East, LP, Jan Lunsford, and John Doe, Defendants,
Of Whom Walmart Stores East, LP and Jan Lunsford are theRespondents,

**RESPONDENTS’ SECOND MOTION TO EXTEND TIME
TO FILE AND SERVE INITIAL BRIEF**

Respondents respectfully request a 30-day extension of time in which to file their Initial Brief and Designation of Matter. This request is necessitated because the Court’s ruling on the pending Motion to Strike Appellant’s Designation of Matter may have a material effect on the Initial Briefs for both parties and the Record on Appeal. Moreover, Respondents’ counsel’s other case demands and deadlines will not allow them to complete the Initial Brief and Designation of Matter within the current deadline. Currently, these items are due on July 22, 2022. With the additional 30-day extension, they will be due on **August 22, 2022**.

This is Respondents' second request for an extension of time in this matter. The requested extension will not prejudice any party, and counsel for Appellant Jacob Murdaugh has consented to this request. See Exhibit A.

Respectfully submitted,

/s/ Robert C. Blain

Robert C. Blain, SC Bar No. 100024

GAFFNEY LEWIS LLC

3700 Forest Drive, Suite 400

Columbia, South Carolina 29204

(803) 790-8838

rblain@gaffneylewis.com

July 19, 2022

Attorney for Respondents

From: [Thomas Nelson](#)
To: [Robert Blain](#)
Cc: [Michelle McManigal](#); [Jamie Wilson](#)
Subject: Re: Murdaugh v. Walmart
Date: Thursday, July 7, 2022 6:46:16 PM
Attachments: [image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)

Agreed.

Sent from my iPhone

On Jul 7, 2022, at 5:11 PM, Robert Blain <rblain@gaffneylewis.com> wrote:

Tom,

I hope you and your family had a nice 4th of July holiday weekend. I will be out on vacation most of next week, so I'm trying to get ahead on some tasks. My deadline to file Respondent's Initial Brief is currently July 22. I'd like to ask for a second 30-day extension. Please let Jamie and I know if you will consent. Thanks

Robert C. Blain
GAFFNEYLEWIS LLC
(803) 875-1920
www.gaffneylewis.com



GAFFNEYLEWIS LLC

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From: Thomas Nelson <tnelson@charlestonlaw.net>

Sent: Tuesday, June 14, 2022 3:47 PM

To: Robert Blain <rblain@gaffneyLewis.com>; Michelle McManigal <mmcmanigal@charlestonlaw.net>

Cc: Jamie Wilson <JWilson@gaffneyLewis.com>

Subject: Re: Murdaugh v. Walmart Stores East - SC Court of Appeals and Colleton County Common Pleas Filings 6.13.22

I consent to an extension, or even a stay if that makes more sense, until your motion is resolved.

Thomas C. Nelson, Esq.

Futeral & Nelson, LLC
1004 Anna Knapp Blvd., Suite 3
Mount Pleasant, South Carolina 29464
(843) 284-5500
(fax) 284-5501

www.charlestonlaw.net



Attorneys Serving the Lowcountry

Please copy paralegal Michelle McManigal on any emails at mmcmanigal@charlestonlaw.net

From: Robert Blain <rblain@gaffneyLewis.com>

Date: Tuesday, June 14, 2022 at 3:06 PM

To: Michelle McManigal <mmcmanigal@charlestonlaw.net>

Cc: Thomas Nelson <tnelson@charlestonlaw.net>, Jamie Wilson <JWilson@gaffneyLewis.com>

Subject: RE: Murdaugh v. Walmart Stores East - SC Court of Appeals and Colleton County Common Pleas Filings 6.13.22

Good afternoon Thomas,

Sorry I missed your call yesterday. Please copy my paralegal Jamie Wilson when sending links or documents about this case, like the email transmittal yesterday.

I'd like to ask for an extension to file Respondent's Initial Brief to allow time for the Court of Appeals to handle the pending preliminary motions. Will you consent to a 30-day extension? Thanks in advance.

Robert C. Blain
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GAFFNEYLEWIS LLC

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IRS CIRCULAR 230 NOTICE: Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.

From: Michelle McManigal <mmcmanigal@charlestonlaw.net>
Sent: Monday, June 13, 2022 5:49 PM
To: Robert Blain <rblain@gaffneylewis.com>
Cc: Thomas Nelson <tnelson@charlestonlaw.net>
Subject: Murdaugh v. Walmart Stores East - SC Court of Appeals and Colleton County Common Pleas Filings 6.13.22

Good Afternoon Mr. Blain;

Please see below the link for all documents that were filed with SC Court of Appeals and Colleton County Common Pleas.

<https://securisync.intermedia.net/us2/s/nvURaJS5fGhHq0hgOUqGQy00125a00>

Very respectfully,

Michelle McManigal
Paralegal
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1004 Anna Knapp Blvd., Suite 3
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(fax) 284-5501
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Walmart Stores East, LP, Jan Lunsford, and John Doe, Defendants,
Of Whom Walmart Stores East, LP and Jan Lunsford are theRespondents,

CERTIFICATE OF SERVICE

I do hereby certify, on this 19th day of July 2022, that a copy of the foregoing
Respondents' Second Motion To Extend Time To File and Serve Initial Brief was served by
electronic mail, addressed to counsel of record as follows:

Thomas C. Nelson, Esq.
Futeral & Nelson, LLC
tnelson@charlestonlaw.net
Attorney for Appellant

/s/Robert C. Blain
Robert C. Blain, SC Bar No. 100024
GAFFNEYLEWIS, LLC
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Columbia, South Carolina 29204
(803) 790-8838
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Attorney for Respondents