

**RECEIVED**

**Aug 10 2022**

**SC Court of Appeals**

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

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

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Case No.: 2021-CP-40-00206

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Rumsey Construction & Renovation, LLC dba Rumsey Construction  
& Restoration, .....Appellant,

v.

Thomas and Stacy Lanham, .....Respondents,

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**MOTION FOR FILE OUT OF TIME  
FOR REPLY BRIEF OF APPELLANT**

COMES NOW Appellant Rumsey Construction & Restoration, LLC dba Rumsey Construction & Restoration (“Rumsey”) by and through it undersigned counsel, and moves for an extension of thirty (10) days’ additional time to file/serve its reply brief in response to Respondents Thomas and Stacy Lanham’s Initial Brief.

Rumsey respectfully requests that this deadline be extended by 10 days (from August 10, 2022), i.e., through August 22, 2022. Respectfully, Rumsey believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents. Additionally, counsel for Respondents has graciously granted consent to this relief.

WHEREFORE, Rumsey moves this Honorable Court to grant it an additional extension of 10 days’ time to file/serve its reply brief. With the extension requested herein, the new deadline

for filing/serving its reply brief would be August 22, 2022, according to the undersigned's calculations.

Respectfully submitted,

THE WARD LAW FIRM, P.A.

*Attorneys for Appellant Rumsey Construction &  
Renovation, LLC dba Rumsey Construction &  
Restoration*

s/John E. Rogers, II

John E. Rogers, II, (SC Bar #72779)

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Richland, South Carolina

August 10, 2022

**From:** [Sherry Santana](#)  
**To:** [kbarnes@barneslawfirm.com](mailto:kbarnes@barneslawfirm.com); [josh@cantwelllawfirm.org](mailto:josh@cantwelllawfirm.org)  
**Cc:** [Jonathan Clark](#); [John Rogers](#); [Kirby Parham](#); [Julianna Brownlee](#)  
**Subject:** Lanham v. Rumsey  
**Date:** Wednesday, August 10, 2022 11:30:00 AM  
**Attachments:** [Appellant's Mot to File out of Time for Reply Brief 8-10-22.pdf](#)

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Ms. Barnes and Mr. Cantwell,

Attached is a copy of the Appellant's Motion for File Out of Time for Reply Brief of Appellant that will be filed with the Court today.

Thank you,

Sherry

Sherry Santana  
Paralegal to John E. Rogers, II  
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**In light of the April 3, 2020 Order of the South Carolina Supreme Court (Order 2020-04-03-01), we will be serving discovery and motions via email only. If you would like a hard copy, please let us know.**

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**CERTIFICATE OF COUNSEL**

In accordance with Rule 211(b), SCACR, the undersigned certifies that the Motion for File Out of Time for Reply Brief of Appellant complies with the Supreme Court Order of August 25, 2021.

**THE WARD LAW FIRM, P.A.**

*s/T. Jonathan Clark*  
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*Attorneys for Appellant Rumsey  
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Rumsey Construction & Restoration*

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**PROOF OF SERVICE**

The undersigned hereby certifies that on August 10, 2022, it served the foregoing Motion for File out of Time for Reply Brief of Appellant via email (attached hereto as Exhibit A) and via the US Postal Service, containing the above-referenced document to all counsel of record’s individual AIS email addresses pursuant to the SC Supreme Court COVID Order 2020-05-29-02. A list of counsel served is as follows:

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**By:**

**THE WARD LAW FIRM, P.A.**

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August 10, 2022