

RECEIVED

Sep 06 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

Appeal No.: 2022-000328

Mark Shaffer, as Personal Representative of the
Estate of Susan Shaffer, Appellant,

v.

DEH Disaster Recovery, LLC, Ceres Environmental
Services, Inc.; Beaufort County, A Political
Subdivision of the State of South Carolina;
Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson;
Brandi Dotson; Spencer A. Olson Trucking, LLC;
Buyers Products, Co.; and TruckPro, LLC, Defendants,

Of which Ceres Environmental Services, Inc. and
Beaufort County, A Political Subdivision of the
State of South Carolina are the Appellants-Respondents,
And Spencer A. Olson Trucking, LLC, DEH Disaster
Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

**RESPONDENTS DEH DISASTER RECOVERY, LLC,
AND RYAN COLTER STOLTZ
MOTION FOR EXTENSION OF TIME**

Respondents DEH Disaster Recovery, LLC and Ryan Colter Stoltz hereby move for an extension of time in which they must file: 1) their Initial Brief and Designation of Matter in response to Appellant Mark Shaffer’s Initial Brief, filed August 19, 2022, and 2) their Initial Brief and Designation of Matter in response to Appellant/Respondents Ceres Environmental Services, Inc. and Beaufort County, A Political Subdivision of the State of South Carolina’s Initial Brief, filed August 29, 2022. Respondents require these extensions due to other deadlines and arguments falling around the time of each of these due dates.

Respondents' Initial Brief and Designation of Matter in response to Appellant Mark Shaffer currently are due on September 18, 2022, and their Initial Brief and Designation of Matter in response to Appellant/Respondents Ceres Environmental Services, Inc. and Beaufort County, A Political Subdivision of the State of South Carolina, currently are due on September 28, 2022. With 30-day extensions, Respondents' Initial Briefs and Designations of Matter will be due on October 18, 2022 and October 28, 2022, respectively. This is Respondents' first request for an extension.

Respectfully submitted,

MCANGUS GOUDELOCK & COURIE, LLC

September 6, 2022

s/ Helen F. Hiser

Helen F. Hiser, S.C. Bar No.: 76124

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

helen.hiser@mgclaw.com

Attorneys for Respondents DEH Disaster Recovery, LLC, and Ryan Colter Stoltz

RECEIVED

Sep 06 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

Appeal No.: 2022-000328

Mark Shaffer, as Personal Representative of the
Estate of Susan Shaffer, Appellant,

v.

DEH Disaster Recovery, LLC, Ceres Environmental
Services, Inc.; Beaufort County, A Political
Subdivision of the State of South Carolina;
Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson;
Brandi Dotson; Spencer A. Olson Trucking, LLC;
Buyers Products, Co.; and TruckPro, LLC, Defendants,
Of which Ceres Environmental Services, Inc. and
Beaufort County, A Political Subdivision of the
State of South Carolina are the Appellants-Respondents,
And Spencer A. Olson Trucking, LLC, DEH Disaster
Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

PROOF OF SERVICE

I certify that I have served Respondents DEH Disaster Recovery, LLC, and Ryan Colter Stoltz **Motion for Extensions of Time** on Appellant, Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, and other counsel of record on this day by emailing a copy of it as follows:

H. Fred Kuhn, Jr., Esquire
James. H. Moss, Esquire
Moss & Kuhn, P.A.
Post Office Drawer 507
Beaufort, South Carolina 29901-0501
fred@mossandkuhn.com
jim@mossandkuhn.com
Attorneys for Plaintiff/Appellant Mark Shaffer

R. Patrick Flynn, Esquire
Pope Flynn, LLC
Post Office Box 70
Charleston, South Carolina 29402
pflynn@popeflynn.com

Attorneys for Appellants-Respondents Ceres Environmental Services, Inc. and Beaufort County A Political Sub-Division of the State of SC

E. Mitchell Griffith, Esquire
Kelly D. Dean, Esquire
Griffith, Freeman & Liipfert, LLC
Post Office Box 570
Beaufort, South Carolina 29902
mgriffith@griffithfreeman.com
kdean@griffithfreeman.com

And

Steven D. Pattee, Esquire
Julius Gernes, Esquire
Donna Law Firm, PC
7601 France Avenue South, Suite 350
Minneapolis, Minnesota 55435
spattee@donnalaw.com
jgernes@donnalaw.com

Attorneys for Respondent Spencer A. Olson Trucking, LLC

Russell M. Racine
Cranfill Sumner & Hartzog LLP
2907 Providence Road, Suite 200
Charlotte, North Carolina 28211
rracine@cshlaw.com

And

Jonathan M. Menuez
Sutter O'Connell
3600 Erieview Tower, 1301 East 9th Street
Cleveland, Ohio 44114
jmenuez@sutter-law.com

Attorney for Truck Pro, LLC and Buyers Products Company

Charles W. Thomson, Esquire
Glynn Cappell, Esquire
Cappell Thomson, LLC
321 East Bay Street
Charleston, South Carolina 29401
CThomson@CapellThomson.com

And

Marc J. Meister
Marc J. Meister, PLLC
14 Myrtle Bank Road
Hilton Head Island, South Carolina 29926
marc@meisterlegal.com
**Attorneys for Dotson and Son Trucking, Inc., Matt T. Dotson,
Tim Tod Dotson.**

Gray T. Culbreath, Esq.
Alice P. Adams, Esquire
Makenzie E. Polston, Esq.
Gallivan White & Boyd, PA
1201 Main Street, Suite 1200
Columbia, South Carolina 29201
gculbreath@gwblawfirm.com
aadams@gwblawfirm.com
mpolston@gwblawfirm.com
Attorneys for Tetra Tech, Inc.

McANGUS GOUDELOCK & COURIE, LLC

September 6, 2022

s/Helen F. Hiser

Helen F. Hiser
S.C. Bar No.: 76124
735 Johnnie Dodds Blvd., Suite 200 (29464)
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900
helen.hiser@mgclaw.com

*Attorneys for Respondents DEH Disaster Recovery,
LLC and Ryan Colter Stoltz*



RECEIVED

Sep 06 2022

SC Court of Appeals

Reply To

HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

September 6, 2022

Via S.C. Courts E-Filing & U.S. Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased v. Ryan Colter Stoltz, DEH Disaster Recovery, LLC, Ceres Environmental Services, Inc., Beaufort County A Political Subdivision of the State of South Carolina, Matt T. Dotson, Tim Tod Dotson, Brandi Dotson, Dotson & Son Trucking, LLC, Spencer A. Olson Trucking, LLC, Buyers Products Company, TruckPro, LLC, ST Sales, LLC and Tetra Tech, Inc.
Civil Action No.: 2017-CP-07-01739 (Beaufort)
Date of Incident: May 3, 2017
Carrier Claim No.: 180204-GF
MGC File No.: 20302.17106
Appeal No.: 2022-000328

Dear Ms. Kitchings:

Enclosed please find the original of Respondents DEH Disaster Recovery, LLC and Ryan Colter Stoltz Motion for Extensions of Time, and the Proof of Service in the above-referenced matter. We are serving counsel of record via email only. Pursuant to the Supreme Court's Order, 2021-08-25-03, Reduced Number of Copies Required in Appellate Matters, and Rule 267(f), SCACR, only one copy of the Motion is being submitted.

We will send our firm's check in the amount of \$50 for filing the motion via U.S. Mail with a copy of this letter. Please do not hesitate to contact the undersigned if the Court requires additional copies and/or if you have any questions.

Yours truly,

McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Counsel of Record (via email only)

McANGUS GOUDELCK & COURIE LLC

735 JOHNNIE DODDS BLVD, STE 200
POST OFFICE BOX 650007
MT. PLEASANT, SC 29465

843.576.2900 PHONE
843.534.0605 FAX
WWW.MGCLAW.COM