

**RECEIVED**  
**Sep 12 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

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The Honorable DeAndrea Gist Benjamin  
Circuit Court Judge

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C.A. No.: 2019-CP-40-05127

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Takeema Jones Young .....Respondent,

v.

Regal Cinema, Inc. d/b/a Sandhill 16 .....Appellant.

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**CONSENT MOTION FOR SIXTY (60) DAY EXTENSION OF TIME FOR APPELLANT  
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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The Appellant's initial brief and designation of matter are currently due on October 3, 2022. Due to a long planned vacation of counsel, Appellant sought consent for a thirty (30) day extension of time. Counsel for Respondent graciously agreed but requested that Appellant seek a sixty (60) day extension due to his schedule this fall and his desire to have a chance to review the materials from the trial of this matter prior to service of the Appellant's initial brief. For this reason, Appellant respectfully requests a sixty (60) day extension of time in which to file its initial brief and designation of matter to be included in the record on appeal, making them due on December 2, 2022. Appellant asks that current filing deadlines be stayed pending resolution of this motion.

We so move:

HAYNSWORTH SINKLER BOYD, P.A.

s/ Sarah P. Spruill

Sarah P. Spruill, SC Bar # 68337

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*Attorneys for Appellant*

*Regal Cinema, Inc., d/b/a Sandhill 16*

We consent:

s/ Dietrich A. Lake

THE LAKE LAW FIRM

Dietrich A. Lake, SC Bar # 69649

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Columbia, SC 29210

T: 803.750.8311

*Attorney for Respondent*

September 12, 2022

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APPEAL FROM RICHLAND COUNTY  
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C.A. No.: 2019-CP-40-05127


Takeema Jones Young ..... Respondent,

Regal Cinema, Inc., d/b/a Sandhill 16 .....Appellant.

**PROOF OF SERVICE**

I certify that I have served *Consent Motion for Sixty (60) Day Extension of Time for Appellant to File Initial Brief and Designation of Matter to Be Included in the Record on Appeal* on all attorneys of record by electronic mail on September 12, 2022 addressed to:

Dietrich A. Lake  
The Lake Law Firm  
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[Dietrich@thelakelawfirm.org](mailto:Dietrich@thelakelawfirm.org)

  
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September 12, 2022

**VIA EMAIL AN U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 16629  
Columbia, SC 29201

Re: *Takeema Jones Young v. Regal Cinema, Inc., d/b/a Sandhill 16*  
C.A. No. 2019-CP-40-05127

Dear Ms. Kitchings:

This firm represents the Appellant Regal Cinema, Inc. d/b/a Sandhill 16 in the above matter. Enclosed for filing, please find a *Consent Motion for Sixty (60) Day Extension of Time for Appellant to File Initial Brief and Designation of Matter to Be Included in the Record on Appeal*, together with our Proof of Service for the same. Also enclosed is our firm's check to cover the cost of the filing fee (w/mailed copy).

If you have any questions, please give me a call. Thank you for your assistance in this matter. Please note service on counsel of record by copy of this letter. In the meantime, we ask that the current filing deadline be stayed pending resolution of this request.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.

  
Sarah P. Spruill

SPS/sac  
Enclosures

cc: Dietrich A. Lake