

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Sep 13 2022

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2022-001061

Ranjiv Saini,

Appellant,

v.

Arnett Construction, LLC; Atlantic Engineering, LLC; Ford Plumbing, LLC; Cohen's Drywall Company, Inc.; Robert Wasson, d/b/a Wasson Electric; Barbara P. Russ d/b/a Wasson Heating & Air Services; Daniel J. Murphy, III, d/b/a Perfectly Painted; John C. Sullivan; S.Arch+Studio, LLC; Custom Designers, LLC/ Enviro-foam Technologies, Inc.; and Baranov Flooring, LLC; Defendants,

Of which Baranov Flooring, LLC, is the Respondent.

MOTION FOR EXTENSION

Appellant Ranjiv Saini, pursuant to Rule 240, SCACR, moves this Court for a 30 day extension of the deadline for his initial brief and designation of matter. Appellant's primary counsel, who is a solo practitioner, during the month of August had to prepare for a jury trial in a matter, *Bramson v. Evans, et. al.*, 2020-CP-18-00337, which prevented Appellant's counsel from dedicating sufficient time to prepare the initial brief; this appeal requires Appellant's counsel to brief issues of law that are novel in South Carolina and thus additional time is needed for briefing; and Appellant's counsel has had an unusually high workload as the Courts emerge from Covid protocols.

The initial brief and designation of matter are currently due September 14, 2022. If the requested extension is granted, they will be due on October 14, 2022.

Appellant's Counsel attempted has consulted with counsel for the Respondent

regarding this motion, and Respondent's Counsel has consented to the relief requested in this Motion.

September 13, 2022

/s/ James L. Floyd, III ("Lee")
THE FLOYD LAW FIRM
S.C. Bar No. 74957
3255 Maybank Highway
Johns Island, SC 29455
(843) 258-1200
lfloyd@floydlawsc.com

Albert Bilbrey, Jr.
COOPER & BILBREY
Federal Court ID 12938
South Carolina Bar 103799
agbilbrey@jhcooper.com
P.O. Box 22513
Charleston, SC 29413
843-883-9099
F 843-883-9335

-AND-

Eric K. Gressman, Esquire (*Pro Hac Vice*)
KELLEY KRONENBURG
1111 Brickell Ave., Suite 1900
Miami, FL 33131

Attorney for Appellant

Charleston, South Carolina

Other Counsel of Record:

Stacey P. Canaday, Esquire
Tupper, Grimsley, Dean & Canaday, P.A.
PO BOX 2055
Beaufort, SC 29901-2055
staceycanaday@tgdcpa.com

Attorney for Respondent
(843) 524-1116

Ranjiv Siani v. Arnett Construction, LLC, et. al., Case No. 2018-CP-10-5468
List of All Counsel of Record

Katherine Walker, Esquire
R. Michael Ethridge, Esquire
Dylan C. Kidd, Esquire
Ethridge Law Group, LLC
1100 Queensborough Blvd., Suite 200
Mount Pleasant, SC 29464
kwalker@ethridgelawgroup.com
dkidd@ethridgelawgroup.com
ksenseny@ethridgelawgroup.com
Counsel for Arnett Construction, LLC

John E. Robinson, Esquire
36 Broad Street
Charleston, SC 29401
john.robinson@charlestonlawoffice.com
Counsel for S.Arch+Studio, LLC and John Sullivan

Phillip P. Cristaldi, III, Esquire
Jeffrey A. Ross, Esquire
Kirkley G. White, Esquire
1242 White Flat Road
Mt. Pleasant, SC 29464
pcristaldi@rcaalaw.com
Counsel for EnviroFoam Technologies

L. Dean Best, Esquire
Jenkins H. Wilson, Esquire
Best Honeycutt, P.A.
Post Office Box 13466
102 Wappoo Creek Drive
Suite 8 (29412)
Charleston, SC 29422
jenkins@besthoneycutt.com
dean@besthoneycutt.com
T: (843) 793-4744
Counsel for Cohen's Drywall

Stacey P. Canaday, Esquire
Tupper, Grimsley, Dean & Canaday, P.A.
PO BOX 2055
Beaufort, SC 29901-2055
staceycanaday@tgdcpa.com
Counsel for Baranov Services, Inc.



3255 Maybank Highway
Johns Island, SC 29455
Tel: (843) 258-1200/Fax: (843) 790-9235
lfloyd@floydlawsc.com/www.floydlawsc.com

September 13, 2022

VIA U.S. MAIL & EMAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
ctappfilings@sccourts.org
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

Sep 13 2022

SC Court of Appeals

RE: Saini, Appellant, v. Arnett Construction, LLC, et. al.,
Appellate Case No. 2022-001061

Dear Ms. Kitchings:

I hope you are well. I am writing to request a thirty (30) day extension of time for Appellant to file his initial brief in the above-referenced appeal. My office received the transcript the hearing on the Motion for Summary Judgment from which this Appeal arises on August 15, 2022. A thirty (30) day extension will make Appellant's brief due on or before October 15, 2022. Respondent's counsel has consented to the requested extension. I have enclosed the Motion for the Extension and my firm's check for the filing fee of Fifty and No. Dollars (\$50.00).

Please let my office know if we can provide any additional information for the Court. Thank you for your assistance with this matter.

Sincerely,

/s/ James L. Floyd, III
THE FLOYD LAW FIRM
S.C. Bar No. 74957
3255 Maybank Highway
Johns Island, SC 29455
(843) 258-1200
lfloyd@floydlawsc.com

Attorney for Appellant

Cc (e-mail only): Tyler Clark, Appeals Specialist (tpclark@sccourts.org)
Stacey P. Canaday, Esquire, Attorney for Respondent
(staceycanaday@tgdcpa.com)
Other Counsel of Record