

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

**Sep 14 2022**

**SC Court of Appeals**

APPEAL FROM COLLETON COUNTY  
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

Bentley D. Price, Circuit Court Judge

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Consolidated Appellate Case No.: 2020-000607

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Larry Rahn .....Respondent,

-v-

Barbara Smith .....Appellant.

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MOTION FOR EXTENSION OF TIME  
TO FILE RESPONDENT'S INITIAL BRIEF

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The Initial Brief of Respondent Larry Rahn is currently due to be filed and served September 23, 2022. Respondent respectfully requests a thirty (30) day extension of time in which to file his Initial Brief pursuant to Rule 263 and 240, South Carolina Rules of Appellate Procedure, in order to provide the parties with further time to attempt to resolve this matter through agreement. One previous extension has been sought by Respondent. The requested extension would make Respondent's Initial Brief due on October 24, 2022.

The undersigned attorney for the Respondent hereby certifies that he has consulted with counsel for the Appellant, Thomas J. Rode, who consents to Respondent's request for an additional thirty (30) day extension of time.

Respectfully submitted,

PARKER LAW GROUP, LLP

September 14, 2022  
Hampton, South Carolina

By:  \_\_\_\_\_

Ronnie L. Crosby (SC Bar # 66481)  
John E. Parker, Jr. (SC Bar #104225)  
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P.O. Box 0 457  
Hampton, SC 29924  
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*Attorneys for Respondent*

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Larry Rahn .....Respondent,

-v-

Barbara Smith .....Appellant.

**PROOF OF SERVICE**


The undersigned certifies that a copy of Respondent’s Second Motion for Extension of Time to file Respondent’s, Initial Brief has been served upon the following counsel of record by emailing a copy of the same this 14th day of September 2022.

Thomas Rode, Esq.  
THURMOND KIRCHNER & TIMBES, P.A  
15 Middle Atlantic Wharf.  
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PARKER LAW GROUP, LLP

September 14, 2022  
Hampton, South Carolina

By:   
John E. Parker, Jr.

September 14, 2022

**Via Email Only: ctappfilings@sccourts.org**

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

**RECEIVED**  
**Sep 14 2022**  
**SC Court of Appeals**

***Re: Larry Rahn v. Barbara Smith***  
***Appellate Case No.: 2020-000607***

Dear Ms. Kitchings:

Please find enclosed for filing Respondent's Second Motion for Extension of Time to file Respondent's, Initial Brief, and Proof of Service. In addition, our firm's check in the amount of \$50.00 will go out in today's mail for the filing fee.

By copy of this letter, Respondent's Second Motion is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated

Cc: Tomas J. Rode, Esq. (Via Email Only)

Gregory E. Parker, Esq. (Via Email Only)