

**RECEIVED**  
**Oct 05 2022**  
**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge  
Civil Action No. 2021-CP-21-02042

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Appellate Case No. 2022-000729

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Thomas Rodriquis Nelson .....Respondent,

v.

Florence Concrete Products, Inc.....Appellant.

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APPELLANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY  
BRIEF

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Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant respectfully requests a seven (7) day extension of time to file its Reply Brief. This is the first request for an extension of this deadline.

Appellant’s counsel requests this extension to allow sufficient time to prepare Appellant’s Reply Brief. Appellant’s counsel has multiple court appearances and depositions scheduled for this week. Appellant has communicated this request for an extension to Respondent’s counsel, who has consented to the extension and does not oppose it.

On September 28, 2022, Appellant was served with Respondent’s Initial Brief. Therefore, Appellant’s Reply Brief is currently due on October 10, 2022. With the additional seven (7) day

extension, Appellant's Reply Brief would be due on October 17, 2022. Appellant requests that the current deadline of October 10, 2022 be held in abeyance pending the Court's consideration and resolution of this Motion.

Respectfully submitted this 5th day of October, 2022.

s/ Wesley B. Sawyer  
Anthony W. Livoti (SCB 13971)  
Wesley B. Sawyer, Esquire (SCB 100229)  
Cordes B. Kennedy (SCB 102287)  
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*Attorneys for Appellant*

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PROOF OF SERVICE

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The undersigned hereby certifies that on October 5, 2022 the foregoing Motion was served on all counsel of record in this action by mailing a copy of the Notice by United States Mail, postage prepaid, and electronic mail to the following addresses:

Counsel served: Ashley B. Nance, Esquire  
King, Love, Hupfer & Nance, LLC  
135 South Dargan Street - Suite 201  
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October 5, 2022

*s/ Wesley B. Sawyer*

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on October 5, 2022, Appellant's Unopposed Motion for Extension of Time to File Reply Brief was served on all counsel of record in this action by electronic mail to the following addresses:

Counsel served: Ashley B. Nance, Esquire  
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October 5, 2022

*s/ Wesley B. Sawyer*

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*Attorneys for Appellant*

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**SENT VIA EMAIL**

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
ctappfilings@sccourts.org

Re: Thomas Rodriquis Nelson vs. Florence Concrete Products, Inc.  
Appellate Case No.: 2022-000729  
Our File No.: 1980-0102

Dear Ms. Kitchings:

Attached for filing please find Appellant's Unopposed Motion for Extension of Time to File Reply Brief and Proof of Service.

Thank you for your attention to this matter.

Very truly yours,

*s/ Wesley B. Sawyer*

Wesley B. Sawyer

WBS/dlb

Enclosures

cc: All counsel of record (*sent via email only*)