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Oct 19 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Appellate Case No. 2022-000346

Reid Fleming..... Appellant

v.

LG Chem, Respondent.
Ltd.....

RESPONDENT’S CONSENT MOTION FOR A SECOND EXTENSION

Pursuant to Rules 208(a)(2) and 240 of the South Carolina Appellate Court Rules, Respondent LG Chem, Ltd. (“LG Chem”) requests a 30-day extension of time to file its Initial Respondent’s Brief in this case. This is the second request for an extension of this deadline.

LG Chem requests this extension based on the undersigned counsel’s observance of religious holidays and other commitments which have prevented her from completing LG Chem’s Initial Brief of Respondent by the current deadline of October 21, 2022. The 30-day extension will make LG Chem’s brief due on Monday, November 21, 2022.

Counsel for Plaintiff has consented to this extension.

Therefore, LG Chem respectfully moves this Court for a 30-day extension of time to file its Initial Brief of Respondent in the above-captioned matter until November 21, 2022. LG Chem

asks that the current deadline be held in abeyance pending the Court's consideration and resolution of this motion.

The filing fee for this request is included.

NELSON MULLINS RILEY & SCARBOROUGH LLP



C. Mitchell Brown
Rachel Atkin Hedley
A. Mattison Bogan
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Post Office Box 11070 (29211-1070)
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Attorneys for Respondent, LG Chem, Ltd.

October 19, 2022

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Reid Fleming,..... Appellant,

v.

LG Chem Ltd. Respondent

PROOF OF SERVICE

I, the undersigned Paralegal, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for LG Chem, Ltd., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow by manner identified below, pursuant to Supreme Court Order of August 25, 2021, and a copy of that electronic mail is attached to this certificate.

Pleading(s): **Respondent’s Consent Motion for Second Extension**

Served: **Via Electronic Mail**
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Via Electronic Mail
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Meredith S. Keane

October 19, 2022

Meredith Keane

From: Meredith Keane
Sent: Wednesday, October 19, 2022 3:40 PM
To: kbarnes@barneslawfirm.com; chris@richardsonthomas.com; john@griffithlawyer.com
Cc: Mitch Brown; Matt Bogan; Rachel Hedley
Subject: Reid Fleming v LG Chem, Ltd. - SC court of Appeals -Appellate Case No. 2022-000346
Attachments: 2022.10.19 Letter to SC Court of Appeals Requesting second 30 Day Extension to File Initial Appellate Brief .pdf; 2022.10.19 Respondent's Consent Motion for Second Extension.pdf

Dear Counsel,
Enclosed for service is Respondent's Consent Motion for a Second Extension in the above referenced matter.
Thank you.



MEREDITH KEANE [SENIOR PARALEGAL](#)

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SC Court of Appeals

By E-Filing and Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Reid Fleming v. The Planet Vape, LLC, et al.
Case No. 2022-000346

Dear Ms. Kitchings:

Attached for filing is Respondent LG Chem, Ltd.'s Consent Motion for a Second Extension and proof of service. By electronic copy of this letter, I am serving all counsel of record as stated below.

The \$50.00 filing fee for this motion is included.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,


Rachel Atkin Hedley

Enclosure

cc: Kathleen C. Barnes (via electronic mail at kbarnes@barneslawfirm.com)
Chris Moore (via electronic mail at chris@richardsonthomas.com)
John Griffith (via electronic mail at john@griffithlawyer.com)