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Oct 25 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable Bentley D. Price, Circuit Court Judge

APPELLATE CASE NO.: 2022-000328

Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased, Appellant

v.

DEH Disaster Recover, LLC, Ceres Environmental Services, Inc.; Beaufort County, A Political Subdivision of the State of South Carolina; Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson; Brandi Dotson; Spencer A. Olson Trucking, LLC; Buyers Products, Co.; and TruckPro, LLC, Defendants

of which Ceres Environmental Services, Inc. and Beaufort County, A Political Subdivision of the State of South Carolina are the Appellant-Respondents.

and Spencer A. Olson Trucking, LLC, DEH Disaster Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

MOTION FOR EXTENSION OF TIME FOR THE APPELLANT
TO FILE THE RECORD ON APPEAL

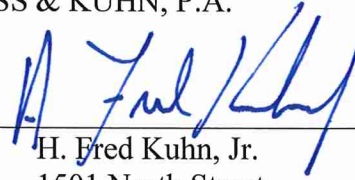
The Appellant would respectfully request an extension of time within which to file the Record on Appeal. The Brief and Designation of Matter are due to be filed no later than October 26, 2022. The Appellant would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice and would not prejudice the Respondents.

It is accordingly respectfully requested that the Appellant be granted until November 26, 2022 to file the Record on Appeal.

MOSS & KUHN, P.A.

By:



H. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina

October 25, 2022

Attorneys for Appellant

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and Spencer A. Olson Trucking, LLC, DEH Disaster Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

CERTIFICATE OF SERVICE

The undersigned certifies that the **Motion for Extension of Time to File Record on Appeal** to which this certificate is affixed, was served upon the parties to this action by depositing a copy of the same, enclosed in a first class, postpaid wrapper properly addressed to the following:

Helen H. Hiser, Esquire
MCANGUS GOUDELOCK & COURIE, LLC
PO Box 650007
Mt. Pleasant, SC 29465

R. Patrick Flynn, Esquire
POPE FLYNN, LLC
Post Office Box 70
Charleston, SC 29401

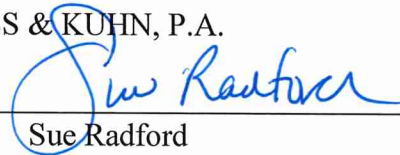
Julius W. Gernes, Esquire
Steven D. Pattee, Esquire
DONNA LAW FIRM, P.C.
7601 France Avenue South, Ste. 350
Minneapolis, MN 55435

E. Mitchell Griffith, Esquire
GRIFFITH, FREEMAN & LIIPFERT, LLC
PO Box 570
Beaufort, SC 29901

in a post office or official depository under the exclusive care and custody of the United States
Postal Service on October 25, 2022.

MOSS & KUHN, P.A.

By: _____


Sue Radford

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∴

MOSS & KUHN, P.A.
ATTORNEYS AT LAW

JAMES H. MOSS
jim@mossandkuhn.com

H. FRED KUHN, JR.
fred@mossandkuhn.com

October 25, 2022

RECEIVED

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SC Court of Appeals

Via S.C. Courts E-Filing and U.S. Mail
The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: ·· Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased v. DEH
Disaster Recovery, LLC, et al.
Appeal No.: 2022-000328

Dear Ms. Kitchings:

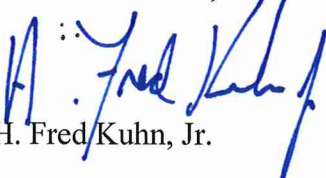
Enclosed please find the Appellant's Motion for Extension of Time to File Record on Appeal and Certificate of Service. I am serving all counsel of record via email only. Pursuant to the Supreme Court's Order, 2021-08-25-03, Reduced Number of Copies Required in Appellate Matters, and Rule 267(f), SCACR, only one copy of the Motion is being submitted.

My firm's check in the amount of \$50.00 for the filing of the Motion is being sent via U.S. Mail with a copy of this letter.

With kindest regards, I am

Very truly yours,

MOSS & KUHN, P.A.


H. Fred Kuhn, Jr.

HFkjrsr
Enclosures

cc: Counsel of Record (via email only)