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**Oct 27 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Frank R. Addy, Jr., Circuit Court Judge

Appellate Case No.: 2022-000470  
Case No. 2021-CP-10-04342

Levi Grantham, LLC, .....Appellant,

v.

Kathy Wright Mitchell, .....Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF  
TIME**

Pursuant to South Carolina Appellate Court Rules 240 and 263(b), Respondent, Kathy Wright Mitchell moves for an extension of thirty (30) days from the existing deadline of November 7, 2022 to file Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in this matter. Respondent was electronically served with Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal on October 7, 2022. If the requested extension is granted, it would be the first extension of time granted to Respondent in this case, and will make Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal due on or before December 7, 2022.

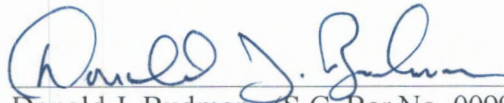
Counsel for Respondent respectfully submits that a thirty (30) day extension to file Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal is

necessary and appropriate due to Appellant counsel's existing work demands, and previously scheduled work commitments.

Additional time is necessary for Respondent's counsel to analyze and designate the matters to be included in the record, fully research the legal issues raised by Appellant in this matter, and prepare and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

For the reasons set forth herein, Respondent's counsel requests a thirty (30) day extension to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal; that is until on or before December 7, 2022.

Respectfully submitted,



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Attorney for Respondent, Kathy Wright Mitchell

October 27, 2022

Charleston, South Carolina

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Levi Grantham, LLC, .....Appellant,  
v..  
Kathy Wright Mitchell, ..... Respondent.

**PROOF OF SERVICE**

This is to certify that I have this day served counsel for the Appellant in the foregoing matter with a copy of *Respondent's Motion for Extension of Time* via electronic mail only, addressed as to him as follows:

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Attorney for Respondent, Kathy Wright Mitchell

October 27, 2022  
Charleston, South Carolina

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October 27, 2022

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
By Email Only: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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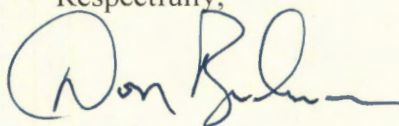
**Re: Levi Grantham, LLC v. Kathy Wright Mitchell**  
**Civil Action No.: 2021-CP-10-04342**  
**Appellate Case No.: 2022-000470**

Dear Ms. Kitchings,

Regarding the above referenced appeal, attached please find the Respondent's Motion for Extension of Time and Proof of Service for filing. By copy of this letter and attachment to the Appellant's attorney, I am serving him electronically with a copy of the same documents.

Thank you for your assistance with this matter. I am placing my \$50.00 motion filing fee in the mail to you today. If you have any questions, please feel free to contact me.

Respectfully,



Donald J. Budman

Cc: E. Brandon Gaskins, Esq. (w/enc)  
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