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**Dec 01 2022**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

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Appellate Case No.: 2022-001175

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Hunsten B. Ragin as Personal Representative of the Estate of Samel  
Ragin.....Appellant,

v.

Pilgrim's Pride Corporation, Mary McBride, and Susan Jones.....Respondent.

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**CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE RESPONDENTS' INITIAL BRIEF**

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Appellant filed and served his Initial Brief of Appellant and Designation of Matter to Be Included on Appeal on November 1, 2022. In accordance with Rule 208(a)(2) of the South Carolina Appellate Court Rules, Respondents' Initial Brief is due on December 1, 2022. In accordance with Rule 209(a), Respondents' Designation of Matter is also due on December 1, 2022. Respondents' do not seek an extension with respect to the Designation of Matter as they accept in full, and without additions, the Designation of Matter as submitted by Appellant. However, Respondents' respectfully request that they be granted a thirty (30) day extension to file their Initial Brief, making the Respondents' Initial Brief due on or before December 31, 2022.

This Motion is being submitted with the express consent of Counsel for the Appellant to Respondents' request for a thirty (30) day extension.

**WE SO MOVE:**

VERNIS & BOWLING OF SOUTH CAROLINA, LLC

s/Thomas B. Pritchard  
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**WE SO CONSENT:**

PARKER LAW GROUP, LLC

s/Neil E. Alger  
Neil E. Alger  
John E. Parker, Jr.  
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-AND-

Dwight C. Moore  
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# VERNIS & BOWLING

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December 1, 2022

**Via First Class Mail and Email**

Jenny Abbott Kitchings, Clerk of Court  
Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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**Dec 01 2022**

**SC Court of Appeals**

**Re:** Hunsten B. Ragin as Personal Representative of the Estate of Samel Ragin vs. Pilgrim's Pride Corporation, Mary McBride, and Susan Jones  
Court of Appeals Case No.: 2022-001175  
Civil Case No.: 2021-CP-43-00307  
V&B File Number: 1485-21035

Dear Ms. Kitchings:

Please be advised we represent Respondents Pilgrim's Pride Corporation, Mary McBride, and Susan Jones in regard to the above-referenced matter. We were served with the Appellant's Initial Brief and Designation of Matter on November 1, 2022. Therefore, Respondents' Initial Brief and Designation of Matter are due today on December 1, 2022. Respondent is hereby requesting an additional thirty (30) days to file and serve Respondents' Initial Brief and Designation of Matter. By our calculations, Respondent's Initial Brief and Designation of Matter will be due on January 2, 2022, should the request be granted. As indicated on the enclosed Motion, counsel for Appellant have consented to same.

I have also enclosed a check in the amount of \$50.00 for the fees for same.

Please let us know if you need any additional information.

With highest regards,

*/s/ Thomas Pritchard*

Thomas B. Pritchard

TBP/rmb

cc: Neil E. Alger, Esquire  
John E. "Jay" Parker, Jr., Esquire  
Dwight C. Moore, Esquire

DELAND, FL  
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HOLLYWOOD, FL  
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