

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

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Case No.: 2018-CP-10-5468  
Appellate Court Case No. 2022-001061

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Ranjiv Saini.....Appellant,

v.

Arnett Construction, LLC; Atlantic Engineering, LLC; Ford Plumbing, LLC; Cohen's Drywall Company, Inc.; Robert Wasson, d/b/a Wasson Electric; Barbara P. Russ d/b/a Wasson Heating & Air Services; Daniel J. Murphy, III, d/b/a Perfectly Painted; John C. Sullivan; S.Arch+Studio, LLC; Custom Designers, LLC/ Enviro-foam Technologies, Inc.; and Baranov Flooring, LLC; Defendants,

Of which Baranov Flooring, LLC is the.....Respondent.

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**SECOND MOTION FOR EXTENSION**

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Respondent Baranov Flooring, LLC, pursuant to Rule 240, SCACR, moves this Court for an additional thirty (30) day extension of the deadline for filing its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal. Presently, the deadline for Respondent’s initial reply brief is January 3, 2023. The parties recently engaged in settlement discussions and had reached a preliminary agreement. However, recent communications with Appellant’s counsel suggest that the settlement may now fail. As a result, Respondent respectfully requests that its deadline to submit its Initial Reply Brief and Designation of Matter

to be Included in the Record on Appeal be extended by thirty (30) days. Further, Respondent's Counsel has consulted with counsel for the Appellant regarding this motion, and Appellant's Counsel has consented to the relief requested in this Motion. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondent moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal. With the extension requested herein, the new deadline for filing/serving its initial reply brief would be February 2, 2023, according to the undersigned's calculations. Further, Respondent's Counsel has consulted with counsel for the Appellant regarding this motion, and Appellant's Counsel has consented to the relief requested in this Motion.

Respectfully submitted,

TUPPER, GRIMSLEY, DEAN & CANADAY, P.A.

s/Stacey P. Canaday

SC Bar No. 68805

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*Attorneys for Defendant Baranov Flooring, LLC*

December 22, 2022  
Beaufort, South Carolina

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Of which Baranov Flooring, LLC is the.....Respondent.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on this 22<sup>nd</sup> day of December, 2022 she has served a copy of the **Second Motion for Extension** by electronic mail only to the following:

South Carolina Court of Appeals  
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December 22, 2022  
Beaufort, SC

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TUPPER, GRIMSLEY, DEAN & CANADAY

ATTORNEYS AT LAW

December 22, 2022

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

**Dec 22 2022**

**SC Court of Appeals**

**RE: Saini, Appellant, v. Baranov Flooring, LLC, Respondent**  
**Appellate Case No. 2022-001061**  
**Our File No.: 500.0900**

Dear Ms. Kitchings:

Enclosed herein please find my firm's check, no. 44204, in the amount of Fifty Dollars and 00/100 (\$50.00), that represents the filing fee for Respondent Baranov Flooring, LLC's Second Motion for Extension filed on December 22, 2022. Should you have any questions, please do not hesitate to contact me. If I am unavailable, please ask to speak with my paralegal, Morgan Reeves.

Very truly yours,

Stacey P. Canaday  
Enclosure  
SPC/mcr