

**RECEIVED**

**Dec 28 2022**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
IN THE COURT OF APPEALS

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**APPEAL FROM CHARLESTON COUNTY**  
Court of Common Pleas for the Ninth Circuit

Mikell R. Scarborough, Master-In-Equity

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2016-CP-10-1143  
Appellate Case No.: 2022-001224

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Palmetto Construction Group, LLC.....Respondent,

v.

Restoration Specialists, LLC,  
Reuben Mark Ward, and  
Lynnette Pennington Ward,.....Appellants.

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**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE  
ITS INITIAL BRIEF AND DESIGNATION OF MATTER**

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COMES NOW the above-named Respondent, pursuant to Rules 240 and 263(b) SCACR, moving this Court for an Order extending the time for filing and serving its Initial Brief and Designation of Matter to be Included in the Record on Appeal which are currently due on or before January 23, 2023. This is Respondent’s first request for an extension.

This request is made due to Respondent’s counsel’s workload. Accordingly, the undersigned respectfully requests an extension of time of thirty (30) days through February 22, 2023 to file and serve Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Counsel for Respondent would show that there is good cause to allow the requested extension of time, as it is in furtherance of the interests of justice and will not result in any undue prejudice upon any other party.

**Respectfully submitted:**

**EPTING & RANNIK, LLC**

December 28, 2022  
Charleston, South Carolina

/s/ Jaan Rannik  
Jaan G. Rannik  
46A State Street  
Charleston, SC 29401  
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*ATTORNEY FOR RESPONDENT*

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Palmetto Construction Group, LLC Respondent,

v.

Restoration Specialists, LLC,  
Reuben Mark Ward, and  
Lynnette Pennington Ward, Appellants.

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**PROOF OF SERVICE**

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I certify that I have served Respondent's Motion for Extension of Time to File and Serve Its Initial Brief and Designation of Matter to Be Included in the Record on Appeal on opposing counsel via e-mail, on December 28, 2022, addressed to Appellants' attorney of record, A. Bright Ariail, Esquire ([bright@brightariailaw.com](mailto:bright@brightariailaw.com)). A copy of the e-mail is attached to this Proof of Service as Exhibit A.

By /s/ Angela Gross  
Angela Gross  
Legal Assistant to  
Jaan G. Rannik and Clinton T. Magill  
46A State Street, Charleston, SC 29401  
Phone: 843-377-1871; Fax: 843-377-1310

# EXHIBIT A

## Angela Gross

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**From:** Angela Gross  
**Sent:** Wednesday, December 28, 2022 3:25 PM  
**To:** bright@brightariailaw.com  
**Cc:** Angela Gross; Jaan Rannik  
**Subject:** Palmetto v. Ward / Appeal No. 2022-001224  
**Attachments:** 2022 12 28 - Motion for Extension to File and Serve Initial Brief and DOM.pdf

Ms. Ariail,

Attached for service, please find Respondent's Motion for Extension of Time to File and Serve Its Initial Brief and Designation of Matter in the above appeal. A Proof of Service will follow under a separate cover email.

With kindest regards,



Angela Gross  
Legal Assistant to Andrew K. Epting, Jr., Esq.  
Jaan G. Rannik, Esq.  
Clinton T. Magill, Esq.  
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