

**RECEIVED**

**Feb 03 2023**

**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

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 Twenty (20) days from the existing deadline of February 7, 2023 to file Respondent’s Final Brief. Respondent was electronically served with the Record on Appeal on January 18, 2023. If the requested extension is granted, it would be the second extension of time granted to Respondent in this case, and will make Respondent’s Final Brief due on or before February 27, 2023.

Counsel for Respondent respectfully submits that a Twenty (20) day extension to file Respondent’s Final Brief is necessary and appropriate due to Appellant counsel’s existing work demands, having just this week on February 1, 2023, finished and filed an initial brief in this court in another case, and being plagued by computer problems in my attempt to have the Final Brief in this case completed by the present deadline.

Additional time is necessary for Respondent’s counsel to properly complete the Final Brief

in a proper and timely manner.

For the reasons set forth herein, Respondent's counsel requests a twenty (20) day extension to serve and file Respondent's Final Brief; that is until on or before February 27, 2023.

Respectfully submitted,

S/ Donald J. Budman

---

Donald J. Budman (S.C. Bar No. 00998)  
Solomon, Budman & Stricker, LLP  
1052 Gardner Rd.  
P.O. Box 30280  
Charleston, SC 29417  
Telephone: (843) 763-1118 ext. 21  
Facsimile: (843) 763-7518  
Email : [dbudman@southcarolinalegal.org](mailto:dbudman@southcarolinalegal.org)

Attorney for Respondent, Kathy Wright Mitchell

February 3, 2023

Charleston, South Carolina

**RECEIVED**

**Feb 03 2023**

**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

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 to File Final Brief* via electronic mail only, addressed as to him as follows:

E. Brandon Gaskins (S.C. Bar No. 73274)  
Moore & Van Allen PLLC  
78 Wentworth Street  
P.O. Box 22828  
Charleston, SC 29413-2828  
Telephone: (843) 579-7000  
Facsimile: (843) 579-7099  
Email: [brandongaskins@mvalaw.com](mailto:brandongaskins@mvalaw.com)  
Attorney for Appellant, Levi Grantham, LLC

S/ Donald J. Budman

Donald J. Budman (S.C. Bar No. 00998)  
Solomon, Budman & Stricker, LLP  
1052 Gardner Rd.  
P.O. Box 30280  
Charleston, SC 29417  
Telephone: (843) 763-1118 ext. 21  
Facsimile: (843) 763-7518  
[dbudman@southcarolinainlaw.org](mailto:dbudman@southcarolinainlaw.org)  
Attorney for Respondent, Kathy Wright Mitchell

February 3, 2023  
Charleston, South Carolina

SOLOMON, BUDMAN & STRICKER, L.L.P.

DONALD J. BUDMAN

MICHAEL A. STRICKER  
(SC, GA, TN)

Attorneys At Law

Triest Executive Center  
1052 Gardner Road, Suite 200  
Charleston, South Carolina 29407

E-Mail: [dbudman@southcarolinalegal.org](mailto:dbudman@southcarolinalegal.org)

Mailing Address:  
P.O. Box 30280  
Charleston, S.C. 29417  
Telephone:  
(843) 763-1118  
Fax:  
(843) 763-7518

February 3, 2023

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

**Feb 03 2023**

**SC Court of Appeals**

**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 request. I am placing the \$50.00 motion filing fee in the mail to you today. Please contact me if you have any questions.

Respectfully,



Donald J. Budman

Cc: E. Brandon Gaskins, Esq.  
Moore & Van Allen, PLLC  
P.O. Box 22828  
Charleston, SC 29413-2828