

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

**Feb 13 2023**

**SC Court of Appeals**

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

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 for 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 APPELLANT'S REPLY BRIEF**

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Pursuant to Rule Rule 240 and Rule 263, SCACR, Appellant Hunsten B. Ragin as Personal Representative for the Estate of Samel Ragin ("Appellant") respectfully moves this Court for an Order extending the deadline for her to reply to Respondent Pilgrim's Pride Corporation, Mary McBride, and Susan Jones's Initial Brief by ten (10) days. The Reply to Respondents' Initial Brief was due to be filed and served February 13, 2023. Appellant requests this extension due to conflicts with other Court deadlines. Counsel for Appellant has consulted with counsel for Respondent and he consents to Appellant's motion.

[SIGNATURE PAGE TO FOLLOW]

I SO MOVE:

s/John E. Parker, Jr.  
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WE CONSENT:

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**ATTORNEYS FOR RESPONDENTS**

Respectfully submitted,

PARKER LAW GROUP, LLP

February 13, 2023  
Hampton, South Carolina

By: \_\_\_\_\_



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***Attorneys for Appellant***

February 13, 2023

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Feb 13 2023

SC Court of Appeals

Via Email Only: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

**Re: *Hunsten B. Ragin v. Pilgrim's Pride Corporation***  
**Appellate Case No.: 2022-001175**

Dear Ms. Kitchings:

Please find enclosed for filing, Appellant's Consent Motion for Extension of Time to file Appellant's Reply Brief, and Proof of Service in regard to the above-referenced matter. In addition, our firm's check for \$50.00 will go out in tomorrow's mail for the filing fee.

By copy of this letter, the Appellant's Motion for Extension of Time to file Appellant's Reply Brief is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated

Cc: Thomas Pritchard, Esq. (Via Email Only)