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Feb 21 2023
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

Mikell R. Scarborough, Master-In-Equity

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

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

v.

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

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

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 February 22, 2023. This is Respondent’s second 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 March 24, 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

February 20, 2023
Charleston, South Carolina

/s/ Jaan Rannik
Jaan G. Rannik
46A State Street
Charleston, SC 29401
Phone: 843-377-1871
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ATTORNEY FOR RESPONDENT

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Palmetto Construction Group, LLC Respondent,

v.

Restoration Specialists, LLC,
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Lynnette Pennington Ward, Appellants.

PROOF OF SERVICE

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 February 20, 2023, addressed to Appellants' attorney of record, A. Bright Ariail, Esquire (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

From: Angela Gross
Sent: Monday, February 20, 2023 1:45 PM
To: bright@brightariailaw.com
Cc: Jaan Rannik; Angela Gross
Subject: Palmetto v. Ward / Appeal No. 2022-001224
Attachments: 2023 02 20 - 2nd 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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