

RECEIVED

Mar 14 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

---

Appellate Case No. 2023-000143  
Civil Action No. 2020-CP-32-00146

CONSTANCE MAYERS as Personal  
Representative for the Estate of Darrius  
“George” Dreher,

Appellant,

v.

Logan Bird, Samuel Bird, James Coleman  
Hunter, Ayden Phillips, Kenneth Cole  
Godley, Dominion Energy South Carolina,  
Inc., Mark McMillan, and Kimberly  
McMillan, Defendants,

of whom AYDEN PHILLIPS is the

Respondent.

---

MOTION FOR EXTENSION

---

Appellant respectfully moves for an extension of time in which to file and serve her Initial Brief. The motion is not made for the purpose of undue delay, but rather due to the undersigned’s heavy workload.

The deadline for filing and serving Appellant’s initial brief is March 29, 2023. However, with the proposed thirty-day extension, the deadline would be May 1, 2023.

**[SIGNATURE ON FOLLOWING PAGE]**

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

Angeline M. Larrivee

S.C. Bar No. 105466

Angeline.larrivee@akimlawfirm.com

Roy T. Willey, IV

SC Bar No. 101010

Roy@akimlawfirm.com

Eric M. Poulin

SC Bar No. 100209

Eric@akimlawfirm.com

Joseph E. Thoensen

S.C. Bar No. 72563

Joe.thoensen@akimlawfirm.com

32 Ann Street

Charleston, SC

29403 (803) 222-2222

&

**LAW OFFICE OF KENNETH G. GOODE,  
JR., LLC**

s/ Kenneth G. Goode, Jr., Esq.

Kenneth G. Goode, Jr., Esq.

S.C. Bar No.: 100368

4 Carriage Lane, Suite 204

Charleston, South Carolina 29407

(p) 843.754.5985

***ATTORNEYS FOR APPELLANT***

Williamston, South Carolina  
March 14, 2023

RECEIVED

Mar 14 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

---

Appellate Case No. 2023-000143  
Civil Action No. 2020-CP-32-00146

---

CONSTANCE MAYERS as Personal  
Representative for the Estate of Darrius  
“George” Dreher,

Appellant,

v.

Logan Bird, Samuel Bird, James Coleman  
Hunter, Ayden Phillips, Kenneth Cole  
Godley, Dominion Energy South Carolina,  
Inc., Mark McMillan, and Kimberly  
McMillan, Defendants,

of whom AYDEN PHILLIPS is the

Respondent.

---

PROOF OF SERVICE

---

Pursuant to Rule 262(c), SCACR, I certify that I have served Appellant’s Motion for Extension on Respondent by Electronic Mail and by placing a copy in the U.S. Mail, postage prepaid, on March 14, 2023, addressed to Respondent’s attorney of record, Catharine Garbee Griffin Baker of Ravenel & Bender, LLP P.O. Box 8057 Columbia, SC 29202.

**[SIGNATURE ON FOLLOWING PAGE]**

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

Angeline M. Larrivee

S.C. Bar No. 105466

Angeline.larrivee@akimlawfirm.com

Roy T. Willey, IV

SC Bar No. 101010

Roy@akimlawfirm.com

Eric M. Poulin

SC Bar No. 100209

Eric@akimlawfirm.com

Joseph E. Thoensen

S.C. Bar No. 72563

Joe.thoensen@akimlawfirm.com

32 Ann Street

Charleston, SC

29403 (803) 222-2222

&

**LAW OFFICE OF KENNETH G. GOODE,  
JR., LLC**

s/ Kenneth G. Goode, Jr., Esq.

Kenneth G. Goode, Jr., Esq.

S.C. Bar No.: 100368

4 Carriage Lane, Suite 204

Charleston, South Carolina 29407

(p) 843.754.5985

***ATTORNEYS FOR APPELLANT***

Williamston, South Carolina

March 14, 2023

TOLL FREE: 1(800) 313-2546  
FACSIMILE: (843) 494-5536

# POULIN | WILLEY ANASTOPOULO

AKIM A. ANASTOPOULO (SC)  
ERIC M. POULIN (SC)(GA)(NC)(CA)  
ROY T. WILLEY, IV (SC)(KY)(NJ)

REPLY TO ANN STREET OFFICE  
TILD@AKIMLAWFIRM.COM

## Transportation & Insurance Liability Division

March 14, 2023

**VIA U.S. MAIL and E-MAIL [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

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

RE: *Constance Mayers v. Logan Bird*  
*Appellate Case No.: 2023-000143*

\*OF COUNSEL

Dear Ms. Kitchings:

Attached for filing, please find Appellant's Motion for Extension with its associated proof of service. A check in the amount of \$50.00 for the filing fee will be sent separately. Please let us know if you need any additional information.

Sincerely,

s/Angeline Larrivee

Cc: Catharine Garbee Griffin (via mail and e-mail)  
Baker Ravenel & Bender, LLP  
P.O. Box 8057  
Columbia, SC 29202

**RECEIVED**  
**Mar 14 2023**  
**SC Court of Appeals**

MAILING: 32 Ann Street, Charleston, South Carolina 29403

Charleston, SC | North Charleston, SC | Columbia, SC | Florence, SC | Greenville, SC | Myrtle Beach, SC  
Charlotte, NC | Lumberton, NC | Wilmington, NC (Appt. Only)