

Apr 20 2023

SC Court of Appeals

REPLY TO:

J. René Josey

E-Mail: JJosey@TurnerPadget.com
Writer's Direct Dial: (843) 656-4451
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April 20, 2023

VIA US MAIL AND EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: RS&A Piping & Fabrication, Inc. a/k/a R. S. & A. Piping, Inc. v. Ronald D. Kirby, Dylan T. Kirby, Treasurer for Marlboro County and Danny T. Williams
Appellate Case No.: 2022-001791
TPGL File No.: 18280.101

Dear Ms. Kitchings:

Pursuant to our telephone conversation and confirmation with your staff, I am writing to informally request that the Court extend the deadline in this matter for Respondents Ronald D. Kirby and Danny T. Williams to file their Initial Brief and Designation of Matter for the Record on Appeal – by thirty (30) days. I understand that this Motion may be made informally by letter which I am emailing and postal-mailing. The current deadline is Monday, April 24, 2023. I have consulted with counsel for the Appellant, Leonard R. Jordan, and I have consulted with counsel for Respondent Dylan T. Kirby, Andrew F. Lindemann. They have consented to this request as is indicated by the enclosed email. With the postal mail, I am enclosing this firm's check in the amount of \$50.00 as payment and filing fee related to this Motion. I appreciate your assistance and that of your staff in this matter.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

J. René Josey

JRJ/alb

Enclosure

cc: Leonard R. Jordan, Esq. (E-Mail Only)
Andrew F. Lindemann, Esq. (E-Mail Only)

Britt, Ashley L.

From: Josey, J. Rene
Sent: Thursday, April 20, 2023 9:32 AM
To: Leonard Jordan; Andrew Lindemann
Cc: lawfirmspencerab@gmail.com; amcleod@hmandrlaw.com; Britt, Ashley L.; Josey, J. Rene
Subject: RE: RS&A Piping & Fabrication, Inc. a/k/a R. S. & A Piping, Inc. v. Ronald D. Kirby, et al.; SCCA Action # 2022-001797, C/A # 21-CP-34-150

Thank you both. We will follow-up with the Court and copy you all.

 **J. Rene Josey**
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From: Leonard Jordan <ljordan@ljordanlaw.com>
Sent: Thursday, April 20, 2023 9:28 AM
To: Andrew Lindemann <Andrew@ldlawsc.com>; Josey, J. Rene <JJosey@TurnerPadget.com>
Cc: lawfirmspencerab@gmail.com; amcleod@hmandrlaw.com; Britt, Ashley L. <ABritt@TurnerPadget.com>
Subject: RE: RS&A Piping & Fabrication, Inc. a/k/a R. S. & A Piping, Inc. v. Ronald D. Kirby, et al.; SCCA Action # 2022-001797, C/A # 21-CP-34-150

I consent.

Leonard R. Jordan, Jr.
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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Thursday, April 20, 2023 9:26 AM
To: 'Josey, J. Rene' <JJosey@TurnerPadget.com>; Leonard Jordan <ljordan@ljordanlaw.com>
Cc: lawfirmspencerab@gmail.com; amcleod@hmandrlaw.com; Britt, Ashley L. <ABritt@TurnerPadget.com>
Subject: RE: RS&A Piping & Fabrication, Inc. a/k/a R. S. & A Piping, Inc. v. Ronald D. Kirby, et al.; SCCA Action # 2022-001797, C/A # 21-CP-34-150

Yes, no problem.

Andrew

Andrew F. Lindemann
Lindemann Law Firm, P.A.

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From: Josey, J. Rene <JJosey@TurnerPadget.com>
Sent: Thursday, April 20, 2023 9:24 AM
To: Andrew Lindemann <Andrew@ldlawsc.com>; Leonard Jordan <ljordan@ljordanlaw.com>
Cc: lawfirm Spencerab@gmail.com; amcleod@hmandrlaw.com; Britt, Ashley L. <ABritt@TurnerPadget.com>; Josey, J. Rene <JJosey@TurnerPadget.com>
Subject: RE: RS&A Piping & Fabrication, Inc. a/k/a R. S. & A Pipining, Inc. v. Ronald D. Kirby, et al.; SCCA Action # 2022-001797, C/A # 21-CP-34-150

Gentlemen,

May I have your consent to an additional 30 days to submit the individual Respondent's initial brief and designation of matters for the record ?

I will follow your responses with a request to the Court.

Rene' Josey



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