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Apr 25 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Appellate Case No.: 2022-001175

Hunsten B. Ragin as Personal Representative for the Estate of Samel
Ragin.....Appellant,

-v-

Pilgrim’s Pride Corporation, Mary McBride, and Susan Jones.....Respondents.

**JOINT MOTION TO FILE FINAL BRIEFS OUTSIDE OF THE FILING DEADLINES AND
MOTION FOR AN EXTENSION**

Pursuant to Rule 240 and Rule 263, SCACR, Appellant Hunsten B. Ragin as Personal Representative for the Estate of Samel Ragin and Respondents Pilgrim’s Pride Corporation, Mary McBride, and Susan Jones jointly move this Court for an Order permitting them to file their Final Briefs outside the filing deadlines and granting a five day extension such that the Final Briefs would be due on April 29, 2023. To be clear, the parties were required by Rule 211(a), SCACR to file and serve their Final Briefs on today’s date, April 24, 2023. However, the Proof of Service filed by Appellant with the Court erroneously stated that counsel for Respondents had

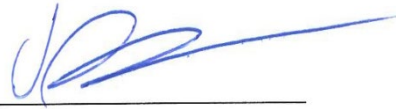
been served with the Record on Appeal on March 31, 2023, when he actually was not served until April 4, 2023, making April 24, 2023 the actual filing deadline for the parties' Final Briefs, and not April 20, 2023. Out of an abundance of caution, the parties file this joint motion asking permission to file outside the filing deadlines to the extent the Court would consider the deadline to have been April 20, 2023. Further, the parties jointly request a five-day extension to file their final briefs due to the confusion caused by this error, which would make the new filing deadline April 29, 2023. This request is being made due to the calendaring and computation error by counsel for Appellant.

Respectfully submitted,

PARKER LAW GROUP, LLP

April 25, 2023
Hampton, South Carolina

By: _____



Neil E. Alger. (SC Bar #100530)
John E. Parker, Jr. (SC Bar #104225)
101 Mulberry Street, East
P.O. Box 487
Hampton, SC 29924
Phone: (803) 943-2111
jayparker@parkerlawgroupsc.com
nalger@pmped.com

~and~

Dwight C. Moore, Esquire
Moore Law Firm, LLC
PO Box 1229
Sumter, South Carolina 29151-1229

Attorneys for Appellant

April 25, 2023

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

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SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed for filing, please find the Appellant's Final Brief, Appellant's Final Reply Brief, Certificate of Counsel, Certificate of Service and a Joint Motion to file final briefs outside the filing deadlines and Motion for and extension in the above-referenced case. In addition, our firm's check in the amount of \$50.00 will go out in today's mail for the filing fee.

By copy of this letter, I am serving all counsel of record with a copy of the same by email only.

If you have any questions, please let us know.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated

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

