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**May 12 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Bentley D. Price  
Circuit Court Judge

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Appellate Case No. 2023-00017

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Kathleen M. Rankin, Appellant,

v.

Palatial Homes, Inc. a/k/a Palatial Homes, LLC n/k/a Palatial Homes Design, LLC;  
Cesar Castro d/b/a Heritage Plastering, Inc. n/k/a Heritage Plastering & Stucco LLC;  
CMC Steel Works, Inc.; AMI Ironworks LLC a/k/a American Master Ironworks,  
LLC; Enaldo Urriola d/b/a Advanced Roofing Services n/k/a Ankon Construction  
Services, LLC; Kelca Counters, Inc.; John Does 1- 20; Cambridge Building, Inc.;  
Two Brothers Plastering, Inc.; William T. Ruarks d/b/a Ruacon Quality  
Construction; Jimmy J. Metcalf, Jr. d/b/a Quality Roof Services; Ionut D. Istrate  
d/b/a Island Plasters LLC; 11 Harrogate Drive Realty Trust; Michael Grondahl;  
Hilton Head Exterminators, Inc.; and Imperial Pest Controllers, Inc.;

Defendants,

Of whom Hilton Head Exterminators, Inc., is the Respondent.

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**MOTION FOR EXTENSION OF TIME**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Kathleen Rankin, through her undersigned counsel, respectfully requests a thirty-day (30) day extension of time to file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is Appellant's second request for extension. This extension is requested due to the undersigned's involvement in a pending jury trial that is scheduled to be called in Charleston

County, South Carolina, and unavoidable deadlines that have arisen in other cases, including matters currently on appeal to this Court.

Appellant's Initial Brief and Designation of Matter is currently due on May 19, 2023. If the request is granted, Appellant's new due date would be June 18, 2023. Appellant also respectfully requests that this Court hold all deadlines in abeyance until an order has been issued on this Motion. Appellant does not request this extension for the impermissible purpose of delay.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

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**Attorney for Appellant Kathleen M. Rankin**

Mount Pleasant, SC  
May 12, 2023

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LLC; Enaldo Urriola d/b/a Advanced Roofing Services n/k/a Ankon Construction  
Services, LLC; Kelca Counters, Inc.; John Does 1- 20; Cambridge Building, Inc.;  
Two Brothers Plastering, Inc.; William T. Ruarks d/b/a Ruacon Quality  
Construction; Jimmy J. Metcalf, Jr. d/b/a Quality Roof Services; Ionut D. Istrate  
d/b/a Island Plasters LLC; 11 Harrogate Drive Realty Trust; Michael Grondahl;  
Hilton Head Exterminators, Inc.; and Imperial Pest Controllers, Inc.;

Defendants,

Of whom Hilton Head Exterminators, Inc., is the Respondent.

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**PROOF OF SERVICE**

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I, the undersigned, certify that I have served Appellant Kathleen M. Rankin's Motion for Extension of Time via electronic mail on Counsel for Respondent Hilton Head Exterminators, Inc., Stephen Kozick, Esquire, at his AIS-designated email address (skozick@kernodlelaw.com) on May 12, 2023.

Pursuant to Rule 262(C)(3), SCACR, and the Order of The Supreme Court of South

Carolina, RE: Methods of Electronic Filing Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), a copy of the aforementioned email correspondence to counsel is attached.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

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Mount Pleasant, SC 29464

jesse@jessesanchezlaw.com

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**Attorney for Appellant Kathleen M. Rankin**

Mount Pleasant, South Carolina  
May 12, 2023



**From:** Jesse Sanchez [jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)   
**Subject:** Kathleen M. Rankin v. Hilton Head Exterminators, Inc. - App. Case No. 2023-00017  
**Date:** May 12, 2023 at 11:26 AM  
**To:** Steve Kozick [skozick@kernodlelaw.com](mailto:skozick@kernodlelaw.com)  
**Cc:** Charlie Thomson [CThomson@capellthomson.com](mailto:CThomson@capellthomson.com), Glynn Capell [GCapell@capellthomson.com](mailto:GCapell@capellthomson.com), Paige Dagnan [pdagnan@capellthomson.com](mailto:pdagnan@capellthomson.com)

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Good morning, Steve,

I have a jury trial that has popped up on the roster this month. Accordingly, for service, please find Appellant's Motion for Extension of Time and corresponding Cover Letter, both of which are being filed momentarily with the Court of Appeals via OneDrive Electronic Submission.

Regards,

Jesse

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**PLEASE NOTE WE HAVE A NEW ADDRESS:**

Jesse Sanchez  
The Law Office of Jesse Sanchez, LLC  
751 Johnnie Dodds Blvd., Suite 200  
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May 12, 2023

VIA ONEDRIVE ELECTRONIC SUBMISSION  
AND FIRST-CLASS MAIL

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

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**May 12 2023**

**SC Court of Appeals**

RE: Kathleen M. Rankin, Appellant v. Hilton Head Exterminators, Inc.  
Respondent – Appellate Case No. 2023-00017

Dear Ms. Kitchings:

Enclosed for filing, please find the following:

1. Appellant Kathleen M. Rankin's *Motion for Extension of Time* to file Appellant's Initial Brief and Designation of Matter;
2. Proof of Service.

A check for the fifty dollar (\$50.00) filing fee has been deposited in today's mail. Thank you for your time and attention to this matter. Please do not hesitate to contact me if you have any questions about this filing.

Sincerely,

s/Jesse Sanchez  
Jesse Sanchez (SC Bar No. 101906)

Attorney for Appellant Kathleen M. Rankin

Cc: Glynn L. Capell, Esq. (Via Email Only)  
Charles W. Thomson, Esq. (Via Email Only)  
Stephen M. Kozick, Esq. (Via Email Only)