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Jun 02 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2023-00044
C/A No. 2021-CP-23-01487

Kevin Dwayne Chavis.....Appellant,

v.

Vansy Saensane and Ra Cha, Inc. d/b/a
Bangkok Tokyo Restaurant a/k/a
Bangkok Thai Restaurant,

of whom

Ra Cha, Inc. d/b/a Bangkok Tokyo Restaurant
a/k/a Bangkok Thai Restaurant isRespondent.


**MOTION FOR EXTENSION OF TIME FOR APPELLANT TO FILE AND SERVE
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL.**

Pursuant to Rules 240 of the South Carolina Appellate Court Rules, the Appellant, Kevin Dwayne Chavis, hereby moves for an extension of time within which to file and serve Appellant’s Initial Brief and Designation of Matter to be included in the Record on Appeal. Chavis requests an extension of twenty (20) days to file the Initial Brief and Designation of Matter which are currently due June 10, 2023.

The grounds for this motion are that counsel for the Appellant needs additional time to prepare the Initial Brief and Designation of Matter as the result of impending court obligations, pre-planned vacation, and other professional obligations. Further, a twenty (20) day delay will not prejudice the rights of any other parties. Notice of this Motion has been provided to counsel for the parties herein and no objection has been indicated. Should the Motion be granted, the Initial Brief and Designation of Matter will be filed with the Court no later than June 30, 2023.

For the stated reasons, Appellant respectfully requests and extension of the deadline for filing and serving the Initial Brief and Designation of Matter until June 30, 2023.

Respectfully submitted,


Daniel L. Draisen SC Bar No. 13536
The Injury Law Firm, P.C.
2006 North Main Street
Anderson, South Carolina 29621

and

Steven M. Krause, SC Bar No.: 3571
Law Offices of Steven M. Krause, PA
207 E. Calhoun Street
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(864) 225-4000
Attorneys for Appellants

June 2, 2023
Anderson, South Carolina

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Ra Cha, Inc. d/b/a Bangkok Tokyo Restaurant
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PROOF OF SERVICE

I certify that I served copies of Appellant’s Motion for Extension of Time for Appellant to File and Serve Initial Brief and Designation of Matter to be Included in the Record on Appeal by United States Mail, postage paid, addressed to:

Helen Hiser, Esq.
Zachary S, Brown, Esq.
Chris Wray, Esq.
McAngus, Goudelock & Courie
55 E. Camperdown Way Suite 300
Greenville, South Carolina 29601
Attorneys for the Respondent

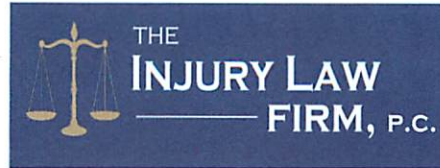

Daniel L. Draisen SC/Bar No. 13536
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Dated: June 2, 2023

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SC Court of Appeals



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DANIEL L. DRAISEN, ESQ.
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June 2, 2023

Hon. Jenny Abbott Kitchings,
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Kevin Dwayne Chavis vs. Vansy Saensane and Ra Cha, Inc.
C/A No. 2021-CP-23-01487
Appellate Case No. 2023-00044

Dear Mrs. Kitchings:

Enclosed please find Appellant's Motion for Extension of Time for Appellant to File and Serve Initial Brief and Designation of Matter to be Included in the Record on Appeal, the original Proof of Service, along with our Motion filing fee in the amount of \$50.00.

Please let me know if you need anything else.

With kind regards,

THE INJURY LAW FIRM, P.C.

A handwritten signature in blue ink that reads "Daniel L. Draisen".

Daniel L. Draisen

DLD
Enclosures
cc: Steven M. Krause, Esq.
Zachary S. Brown, Esq.
Jeanmarie Tankersley, Esq.
Helen Hiser, Esq.



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