

June 12, 2023

**RECEIVED**

**Jun 12 2023**

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Abel v. Lack's Beach Service, Inc.  
Appellate Case No. 2023-000569  
Our File No. 075329/01500

Dear Ms. Kitchings:

Appellant Lack's Beach Service, Inc. respectfully requests a five-day extension of time to file its Reply to the Return to Motion for Limited Remand for Circuit Court to Rule on: 1) Conditional Motion for Reduction of Judgment and on 2) Motion to Amend Answer Under Rule 15(B), SCRCP; and for This Court to Stay Deadlines for Briefing Until Limited Remand Concluded, in the above matter. This request is due to numerous other deadlines and professional obligations and business travel of counsel. The Return was filed on June 8, 2023. If the Court grants this extension, the new deadline for Appellant's Reply will be June 22, 2023.

A check in the amount of \$50.00 will be delivered to the Court. Thank you for your consideration of this request.

Very truly yours,

*s/C. Mitchell Brown*

C. Mitchell Brown

CMB:eh

cc: William M. McLeod, Jr., Esquire (via email)  
John C. Pracht V, Esquire (via email)  
Harry C. Wilson III, Esquire (via email)  
G. Murrell Smith, Jr., Esquire

June 12, 2023  
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Austin T. Reed, Esquire  
Frederick N. Hanna, Jr., Esquire  
Joseph D. Thompson III, Esquire (via email)  
Elizabeth F. Morrison, Esquire (via email)  
Daniel Fuerst, Esquire (via email)

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Kirsti F. Curtis, Circuit Court Judge

Appellate Case No. 2023-000569

Case No. 2019-CP-26-07075

Meswaet Abel, as Personal Representative of the Estate  
of Zerihun Wolde and as Natural Parent and Legal  
Guardian of Adam Wolde and Wubit Wolde, .....

Respondent,

v.

Lack's Beach Service, Inc., City of Myrtle Beach, and  
Joe Doe Lifeguard, Defendants,

Of which Lack's Beach Service, Inc. is the.....

Appellant,

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**PROOF OF SERVICE**

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I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Lack's Beach Service, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified, pursuant to the Supreme Court Order 2022-05-06-03, and a copy of that electronic mail is attached to this certificate.

Pleading(s): Request for extension of time to file Reply to Return to Motion for Limited Remand

Served: William Mullins McLeod, Jr., Esquire  
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*Attorneys for Lacks Beach Service*



Eileen Hindman  
Administrative Assistant

6/12, 2023

## Eileen Hindman

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**From:** Eileen Hindman  
**Sent:** Monday, June 12, 2023 3:42 PM  
**To:** mullins@mcleod-lawgroup.com; chris@864law.com; cooper@mcleod-lawgroup.com; Murrell@smithrobinsonlaw.com; Austin.reed@smithrobinsonlaw.com; Fred.Hanna@smithrobinsonlaw.com; emorrison@hallboothsmith.com; JThompson@hallboothsmith.com; dfuerst@hallboothsmith.com; Mitch Brown; Blake Williams  
**Subject:** Meswaet Abel v. Lack's Beach Service - Appellate Case No. 2023-000569  
**Attachments:** 2023.06.12 CMB letter to COA requesting extension to file Reply to return to motion for limited remand (Wolde) 4861-1301-1305 v.1.pdf; 2023.06.12 Proof of Service (Wolde).pdf

Good afternoon,

Attached for service upon you are a Request for extension of time to file a Reply to the Return to Motion for Limited Remand and Proof of Service in the above matter.

Thank you,



EILEEN HINDMAN SENIOR ADMINISTRATIVE ASSISTANT  
eileen.hindman@nelsonmullins.com

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