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Jun 26 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Bentley D. Price
Circuit Court Judge

Appellate Case No. 2023-00017

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.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent Hilton Head Exterminators, Inc., through its undersigned counsel, respectfully requests a thirty (30) day extension of time to file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is Respondent's first request for an extension. Respondent does not request this extension for the purpose of delay. The extension is requested because of deadlines in other matters and a significant number of discovery depositions already scheduled in several multi-

party asbestos cases involving more than fifty (50) parties in each case. Respondent's Initial Brief and Designation of Matter is currently due on July 19, 2023. If Respondent's Motion is granted, the new deadline would be August 18, 2023. Respondent respectfully requests that the Court hold all deadlines in abeyance until an order has been issued on this Motion.

KERNODLE COLEMAN



By:

Stephen M. Kozick Esquire
(SC Bar No. 78343)
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ATTORNEYS RESPONDENT HILTON
HEAD EXTERMINATORS, INC.

June 26, 2023

Charleston, South Carolina

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Defendants.

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

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to file Initial Brief and Designation of Matter by email and US Mail addressed to the attorneys of record at the following addresses:

THE LAW OFFICE OF JESSE SANCHEZ, LLC

Jesse Sanchez, Esquire

98 ½ Broad Street, Suite B

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and

Glynn L. Capell, Esquire

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Attorneys for Appellant Kathleen M. Rankin

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 email correspondence to counsel is attached.

KERNODLE COLEMAN



By:

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ATTORNEY FOR RESPONDENT
HILTON HEAD EXTERMINATORS, INC.

June 26, 2023

Charleston, South Carolina

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SC Court of Appeals

Stephen M. Kozick, Esquire
skozick@kernodlelaw.com

June 26, 2023

VIA EMAIL & US MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RE: *Rankin v. Palatial Homes, Inc., et al.*
Appellate Case No.: 2023-00017
Our File No.: 6042-138

Dear Ms. Kitchings:

Enclosed for filing, please find Respondent Hilton Head Exterminators, Inc.'s Motion for Extension of time to file Respondent's Initial Brief and Designation of Matter and Proof of Service in the above matter. I have enclosed our firm's check in the amount of \$50.00 for the required fee.

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

KERNODLE COLEMAN

A handwritten signature in blue ink, appearing to read "S. Kozick", is written over the printed name.

Stephen M. Kozick

SMK/kfg
Enclosures

Cc via email only: Jesse Sanchez, Esquire
Glynn L. Capell, Esquire
Charles W. Thomson, Esquire

