

RECEIVED

Jul 03 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2023-000143
Civil Action No. 2020-CP-32-00146

CONSTANCE MAYERS as Personal
Representative for the Estate of Darrius
“George” Dreher,

Appellant,

v.

Logan Bird, Samuel Bird, James Coleman
Hunter, Ayden Phillips, Kenneth Cole
Godley, Dominion Energy South Carolina,
Inc., Mark McMillan, and Kimberly
McMillan, Defendants,

of whom AYDEN PHILLIPS is the

Respondent.

MOTION FOR EXTENSION

Appellant respectfully moves for an extension of time in which to file and serve her Initial Reply Brief. The motion is not made for the purpose of undue delay, but rather due to (1) the fact that Respondent sent his brief to the incorrect email address, and the mailed copy did not arrive until four days later; and (2) the undersigned’s workload.

The deadline for filing and serving Appellant’s initial reply brief is July 6, 2023. However, with the proposed thirty-day extension, the deadline would be July 26, 2023.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

Angeline M. Larrivee (S.C. #105466)

Roy T. Willey, IV (S.C. #101010)

Eric M. Poulin (S.C. #100209)

32 Ann Street Charleston, SC 29403

(803) 222-2222

E: angeline.larrivee@poulinwilley.com

roy@poulinwilley.com

eric@poulinwilley.com

&

**LAW OFFICE OF KENNETH G. GOODE,
JR., LLC**

s/ Kenneth G. Goode, Jr., Esq.

Kenneth G. Goode, Jr., Esq.

S.C. Bar No.: 100368

4 Carriage Lane, Suite 204

Charleston, South Carolina 29407

(p) 843.754.5985

ATTORNEYS FOR APPELLANT

Williamston, South Carolina

July 3, 2023

RECEIVED

Jul 03 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2023-000143
Civil Action No. 2020-CP-32-00146

CONSTANCE MAYERS as Personal
Representative for the Estate of Darrius
“George” Dreher,

Appellant,

v.

Logan Bird, Samuel Bird, James Coleman
Hunter, Ayden Phillips, Kenneth Cole
Godley, Dominion Energy South Carolina,
Inc., Mark McMillan, and Kimberly
McMillan, Defendants,

of whom AYDEN PHILLIPS is the

Respondent.

MOTION FOR EXTENSION

Pursuant to Rule 262(c), SCACR, I certify that I have served Petitioner’s Motion for Extension on Respondent by Electronic Mail on July 3, 2023, addressed to Respondent’s attorney of record, Catharine Garbee Griffin Baker of Ravenel & Bender, LLP.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

Angeline M. Larrivee (S.C. #105466)

Roy T. Willey, IV (S.C. #101010)

Eric M. Poulin (S.C. #100209)

32 Ann Street Charleston, SC 29403

(803) 222-2222

E: angeline.larrivee@poulinwilley.com

roy@poulinwilley.com

eric@poulinwilley.com

&

**LAW OFFICE OF KENNETH G. GOODE,
JR., LLC**

s/ Kenneth G. Goode, Jr., Esq.

Kenneth G. Goode, Jr., Esq.

S.C. Bar No.: 100368

4 Carriage Lane, Suite 204

Charleston, South Carolina 29407

(p) 843.754.5985

ATTORNEYS FOR APPELLANT

Williamston, South Carolina

July 3, 2023

**POULIN | WILLEY
ANASTOPOULO**

Angeline Larrivee <angeline.larrivee@akimlawfirm.com>

Motion for Extension - Constance Mayers v. Logan Bird // 2023-000143

1 message

Angeline Larrivee <angeline.larrivee@akimlawfirm.com>

Mon, Jul 3, 2023 at 4:10 PM

To: cgriffin@brblegal.com, Roy Willey <roy@akimlawfirm.com>, Eric Poulin <eric@akimlawfirm.com>, kenny@kggjlaw.com

Dear Ms. Griffin:

We hope this letter finds you well. Enclosed for service upon you is Appellant's July 3, 2023 Motion for Extension.

Please let us know if you have any questions.

Sincerely,

--

Angeline Larrivee

Staff Attorney



800-313-2546



Charleston

**POULIN | WILLEY
ANASTOPOULO**

Referrals are the greatest compliment

CLICK TO REFER A CASE***www.RespectResults.com***

Practice Areas / Locations / Attorneys / Results

2 attachments**Ltr to Atty Griffin re Motion to Extend re Initial Reply Brief.pdf**

113K

**Motion for Extension - File and Serve Reply Brief.pdf**

76K

TOLL FREE: 1(800) 313-2546
FACSIMILE: (843) 494-5536

REPLY TO ANN STREET OFFICE
TILD@AKIMLAWFIRM.COM

**Transportation & Insurance
Liability Division**

July 3, 2023

VIA E-MAIL ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Constance Mayers v. Logan Bird*
Appellate Case No.: 2023-000143

Dear Ms. Kitchings:

Attached for filing, please find Appellant's Motion for Extension of Time to file and serve her initial reply brief, with its associated proof of service. A check in the amount of \$50.00 for the filing fee is being placed in the mail. Please let us know if you need any additional information.

Sincerely,

s/Angeline Larrivee

POULIN | WILLEY ANASTOPOULO

AKIM A. ANASTOPOULO (SC)
ERIC M. POULIN (SC)(GA)(NC)(CA)
ROY T. WILLEY, IV (SC)(KY)(NJ)

BLAKE G. ABBOTT (SC)(NC)
CONSTANCE ANASTOPOULO (SC)*
A. ELLIOTT HUGER BARROW, JR. (SC)*
HANNA K. BATHRICK (NC)
BRADLEY BURGESS (SC)
MATTHEW J. BURGESS (SC)
JOSHUA P. CANTWELL (SC)
CHASE H. COBLE (SC)
RALPH JAMES D'AGOSTINO III (DC)
ERICA M. DOBRICH (SC)
PAUL DOOLITTLE (SC)
JACQUELINE A. DUFOR (SC)
HERB F. GLASS (SC)(GA)
LANE D. JEFFERIES (SC)
NIKIRA M. LAFRANCE (NC) (SC)
ANGELINE LARRIVEE (NJ) (SC)
RYAN A. LOVE (SC)(NC)
STEPHANIE L. MASCELLA (SC)
FREDRICK J. MOGAB (SC)(NE)
LAUREN E. MOORE (SC)
JESSICA S. NELSON (SC)
J.C. NICHOLSON (SC)
JULIA K. PIRILLO (WV)
REBECCA A. RAYNER (OH)(SC)
INDIA D. SHAW (SC)(DC)
ANDREW D. SMITH (SC)
JOSEPH E. THOENSEN (SC)
BRADLEY TINGER (SC)

*OF COUNSEL

RECEIVED
Jul 03 2023
SC Court of Appeals

MAILING: 32 Ann Street, Charleston, South Carolina 29403

Charleston, SC | North Charleston, SC | Columbia, SC | Florence, SC | Greenville, SC | Myrtle Beach, SC
Charlotte, NC | Lumberton, NC | Wilmington, NC (Appt. Only)