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Aug 08 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas for the First Circuit**

The Honorable Diane S. Goodstein

**Case No.: 2022-CP-18-00295
Appellate Case No.: 2023-000655**

LAURA ABERNATHYPlaintiff /*Appellant*,

v.

ERVIN W. LAMBERT, SR., PERSONAL REPRESENTATIVE OF THE ESTATE OF ERVIN
E. LAMBERT, JR., DECEASED.,Defendant/*Respondent*.

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

COMES NOW the above-named Appellant, pursuant to Rules 240 and 263(b) SCACR, moving this Court for an Order extending the time for filing and serving Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal which are currently due on or before August 16, 2023. This is Appellant’s second request for an extension.

This request is made due to Appellant’s counsel’s workload following his return from paternity leave. Accordingly, the undersigned respectfully requests an extension of time of thirty (30) days through September 15, 2023 to file and serve Appellant’s Initial Brief and Designation of Matter.

Counsel for Appellant would show that there is good cause to allow the requested extension of time, as it is in the furtherance of the interests of justice and will not result in any undue prejudice upon any other party.

Respectfully submitted:

EPTING & RANNIK, LLC

August 8, 2023
Charleston, South Carolina

/s/ Jaan Rannik _____
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Clinton T. Magill
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Charleston, SC 29401
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ATTORNEY FOR PLAINTIFF/APPELLANT

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PROOF OF SERVICE

I certify that I have served Appellant’s Moton for Extension of Time to File and Serve Appellant’s Initial Brief and Designation of Matter dated August 8, 2023, on opposing counsel via e-mail, this 8th day of August, 2023, addressed to Respondents’ attorneys of record as follows:

Lionel S. Lofton, Esq. – lionel@loftonandlofton.com

V. Lynn Lofton, Esq. – lynn@loftonandlofton.com

A copy of the e-mail is attached to this Proof of Service as Exhibit A.

By s/Angela

Angela Gross
Legal Assistant to
Jaan G. Rannik
46A State Street, Charleston, SC 29401
Phone: 843-377-1871; Fax: 843-377-1310

EXHIBIT A

Angela Gross

From: Angela Gross
Sent: Tuesday, August 8, 2023 3:47 PM
To: lynn@loftonandlofton.com; lionel@loftonandlofton.com
Cc: Jaan Rannik; Angela Gross; Clinton T. Magill
Subject: RE: Abernathy v. Lambert / Appellate Case No.: 2023-000655
Attachments: 2023 08 08 - Appellant's Motion for Extension (App. No. 23-655).pdf

Dear Counsel:

Enclosed for service please find Appellant's Motion for Extension of Time to File and Serve Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above matter. A Proof of Service will follow under separate email cover.

With kindest regards,



Angela Gross
Legal Assistant to Andrew K. Epting, Jr., Esq.
Jaan G. Rannik, Esq.
Clinton T. Magill, Esq.
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