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**Aug 23 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. 2023-000117

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, Appellant Kathleen Rankin, through her undersigned counsel, respectfully requests a ten (10) day extension of time to file Appellant's Initial Reply Brief and Additional Designation of Matter to be Included in the Record on Appeal. This is Appellant's first request for extension as to these filings. This extension is requested due to unavoidable deadlines that have arisen in other cases, including matters currently

on appeal to this Court, and the South Carolina Supreme Court. Additionally, Appellant requests this extension so that her counsel may have the opportunity to adequately review the South Carolina Supreme Court's recent opinion in *Kitchen Planners, LLC v. Friedman*, Opinion No. 28173, filed today, August 23, 2023.

Appellant's Initial Reply Brief is currently due on Monday, August 28, 2023. If the request is granted, Appellant's new due date would be Thursday, September 7, 2023. Appellant also respectfully requests that this Court hold all deadlines in abeyance until an order has been issued on this Motion. Appellant does not request this extension for the impermissible purpose of delay.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

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**Attorney for Appellant Kathleen M. Rankin**

Mount Pleasant, SC

August 23, 2023

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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.

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**PROOF OF SERVICE**

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I, the undersigned, certify that I have served Appellant Kathleen M. Rankin's Motion for Extension of Time via electronic mail on Counsel for Respondent Hilton Head Exterminators, Inc., Stephen Kozick, Esquire, at his AIS-designated email address (skozick@kernoddelelaw.com) on August 23, 2023.

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 aforementioned email correspondence to counsel is attached.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

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Mount Pleasant, SC 29464


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(843) 814-8181

**Attorney for Appellant Kathleen M. Rankin**

Mount Pleasant, South Carolina  
August 23, 2023



**From:** Jesse Sanchez [jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)   
**Subject:** Kathleen M. Rankin, Appellant v. Hilton Head Exterminators, Inc., Respondent - App. Case No. 2023-000117  
**Date:** August 23, 2023 at 1:44 PM  
**To:** Steve Kozick [skozick@kernodlelaw.com](mailto:skozick@kernodlelaw.com)  
**Cc:** Charlie Thomson [CThomson@capellthomson.com](mailto:CThomson@capellthomson.com), Glynn Capell [GCapell@capellthomson.com](mailto:GCapell@capellthomson.com), Paige Dagnan [pdagnan@capellthomson.com](mailto:pdagnan@capellthomson.com)

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Counsel,

Attached for service, please find Appellant's Motion for Extension of Time and corresponding Cover Letter, both of which are being filed momentarily with the South Carolina Court of Appeals via OneDrive electronic submission.

Regards,

Jesse

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**PLEASE NOTE WE HAVE A NEW ADDRESS:**

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August 23, 2023

VIA ONEDRIVE ELECTRONIC SUBMISSION  
AND FIRST-CLASS MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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**Aug 23 2023**  
**SC Court of Appeals**

RE: Kathleen M. Rankin, Appellant v. Hilton Head Exterminators, Inc.,  
Respondent. Appellate Case No. 2023-000117

Dear Ms. Kitchings:

Attached, for filing, please find *Appellant's Motion for Extension of Time and Proof of Service*. A check for the fifty dollar (\$50.00) filing fee has been placed in today's mail.

Thank you for your time and attention to this matter. Please do not hesitate to contact me if you have any questions about this request.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)

Cc: Glynn L. Capell, Esq.  
Charles W. Thomson, Esq.  
Stephen M. Kozick, Esq.