

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

SEP 01 2023
SC Court of Appeals

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 fifteen (15) 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 second 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. Specifically, Appellant's counsel has South Carolina Supreme Court deadlines which have arisen for September 8, 2023 and September 11, 2023, which cannot be extended.

Appellant's Initial Reply Brief is currently due on Thursday, September 7, 2023. If this extension is granted, Appellant's new deadline would be Friday, September 22, 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)

751 Johnnie Dodds Boulevard, Suite 200

Mount Pleasant, SC 29464

jesse@jessesanchezlaw.com

(843) 814-8181

Attorney for Appellant Kathleen M. Rankin

Mount Pleasant, SC
September 1, 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.

PROOF OF SERVICE

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 September 1, 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)

751 Johnnie Dodds Boulevard, Suite 200

Mount Pleasant, SC 29464

jesse@jessesanchezlaw.com

(843) 814-8181

Attorney for Appellant Kathleen M. Rankin

Mount Pleasant, South Carolina
September 1, 2023

From: Jesse Sanchez jesse@jessesanchezlaw.com
Subject: Re: Kathleen M. Rankin, Appellant v. Hilton Head Exterminators, Inc., Respondent - App. Case No. 2023-000117
Date: September 1, 2023 at 3:21 PM
To: Steve Kozick skozick@kernodlelaw.com
Cc: Charlie Thomson CThomson@capellthomson.com, Glynn Capell GCapell@capellthomson.com, Paige Dagnan pdagnan@capellthomson.com



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. This Motion is being filed due to deadlines which have been set by the South Carolina Supreme Court in two separate cases, which cannot be extended.

Regards,

Jesse

On Wed, Aug 23, 2023 at 1:44 PM Jesse Sanchez <jesse@jessesanchezlaw.com> wrote:

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:

Jesse Sanchez
The Law Office of Jesse Sanchez, LLC
751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
Office: (843) 804-4753
Direct: (843) 814-8181
Fax: (843) 284-3953
jesse@jessesanchezlaw.com

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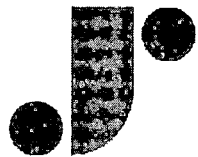
Jesse Sanchez
The Law Office of Jesse Sanchez, LLC
751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
Office: (843) 804-4753
Direct: (843) 814-8181
Fax: (843) 284-3953
jesse@jessesanchezlaw.com

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Rankin...23.pdf 86 KB

Letter t...23.pdf 112 KB



September 1, 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

RECEIVED

SEP 01 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.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

751 Johnnie Dodds Blvd., Suite 200, Mount Pleasant, SC 29464 P: 843.814.8181 F: 843.284.3953
jesse@jessesanchezlaw.com jessesanchezlaw.com