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Oct 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 five (5) day extension of time to file the Record on Appeal. This is Appellant's first request for extension as to the Record. This extension is requested due to unavoidable deadlines that have arisen in other cases, including matters currently on appeal to the South Carolina Supreme Court, which necessitated a response the same

day the record is due.

The Record on Appeal is currently due on Monday, October 23, 2023. If this extension is granted, Appellant's new deadline would be Monday, October, 30, 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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(843) 814-8181

Attorney for Appellant Kathleen M. Rankin

Mount Pleasant, SC
October 23, 2023

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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@kernodlelaw.com) on October 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)

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
October 23, 2023

October 23, 2023

VIA ONEDRIVE ELECTRONIC SUBMISSION
AND U.S. 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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SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed for filing please find the following:

- (1) Appellant Kathleen M. Rankin's Motion for Extension of time to file the Record on Appeal, and
- (2) Proof of Service.

A check for the fifty dollar (\$50.00) filing fee has been deposited in today's outgoing mail. Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)

Enclosures (as stated)

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

THE LAW OFFICE OF JESSE SANCHEZ, LLC

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