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November 30, 2023

**RECEIVED**

**Nov 30 2023**

**SC Court of Appeals**

**Via E-Mail**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Abel v. Lack's Beach Service, Inc.  
Appellate Case No. 2023-000569  
Our File No. 075329/01500

Dear Ms. Kitchings:

Appellant respectfully requests a ten (10) day extension of time to file its initial reply brief of appellant and any supplemental designation of matter. This is Appellant's first request for an extension of this deadline. The current deadline is December 11, 2023. If granted, the new deadline will be **December 21, 2023**.

This request is premised on preplanned, out-of-state business travel of Attorney Brown, numerous other briefing obligations of Attorneys Brown and Williams in this Court and the Supreme Court, the undersigned's participation in a one-week trial in Clarendon County beginning December 4, and work obligations in other matters.

A check in the amount of \$50.00 for the required filing fee will be sent via separate cover. Thank you for your consideration of this request.

Very truly yours,

/s/ Blake T. Williams

Blake T. Williams

BTW:btw  
Enclosure

November 30, 2023

Page 2

cc: William M. McLeod, Jr., Esquire  
Harry C. Wilson III, Esquire  
John C. Pracht V, Esquire  
Joseph D. Thompson III, Esquire  
Elizabeth F. Morrison, Esquire  
Daniel Fuerst, Esquire  
G. Murrell Smith, Jr., Esquire  
Austin T. Reed, Esquire  
Frederick N. Hanna, Jr., Esquire  
C. Mitchell Brown, Esquire

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**Nov 30 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Kirsti F. Curtis, Circuit Court Judge

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Appellate Case No. 2023-000569

Case No. 2019-CP-26-07075

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Meswaet Abel, as Personal Representative of the Estate  
of Zerihun Wolde and as Natural Parent and Legal  
Guardian of Adam Wolde and Wubit Wolde, .....

Respondent,

v.

Lack's Beach Service, Inc., City of Myrtle Beach, and  
Joe Doe Lifeguard, Defendants,

Of which Lack's Beach Service, Inc. is the.....

Appellant,

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**PROOF OF SERVICE**

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I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Lack's Beach Service, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified, pursuant to the Supreme Court Order 2022-05-06-03, and a copy of that electronic mail is attached to this certificate.

Pleading(s): Letter requesting extension for Appellant's initial reply brief

Served: William Mullins McLeod, Jr., Esquire  
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*Attorneys for Meswaet Abel*

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*Attorneys for Lacks Beach Service*



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Eileen Hindman  
Administrative Assistant

11/30, 2023

## Eileen Hindman

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**From:** Eileen Hindman  
**Sent:** Thursday, November 30, 2023 10:29 AM  
**To:** mullins@mcleod-lawgroup.com; chris@864law.com; cooper@mcleod-lawgroup.com; Murrell@smithrobinsonlaw.com; Austin.reed@smithrobinsonlaw.com; Fred.Hanna@smithrobinsonlaw.com; emorrison@hallboothsmith.com; JThompson@hallboothsmith.com; dfuerst@hallboothsmith.com; Mitch Brown; Blake Williams  
**Subject:** Meswaet Abel v. Lack's Beach Service - Appellate Case No. 2023-000569  
**Attachments:** 2023.11.30 BTW ltr to Court of Appeals - Appellant's request for extension (Abel v. Lacks Beach).pdf; 2023.11.30 Proof of Service (Abel v. Lacks Beach).pdf

Good morning,

Attached for service upon you in the above matter is the Appellant's request for extension and Proof of Service.

Thank you,



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