

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2023-00044
C/A No. 2021-CP-23-01487

Kevin Dwayne Chavis.....Appellant,

v.

Vansy Saensane and Ra Cha, Inc. d/b/a
Bangkok Tokyo Restaurant a/k/a
Bangkok Thai Restaurant,

of whom

Ra Cha, Inc. d/b/a Bangkok Tokyo Restaurant
a/k/a Bangkok Thai Restaurant isRespondent.

MOTION TO FILE RECORD ON APPEAL OUTSIDE OF DEADLINES

Pursuant to Rules 240 of the South Carolina Appellate Court Rules, the Appellant, Kevin Dwayne Chavis, hereby moves for an Order allowing Appellant to file the Record on Appeal outside of the deadlines. Chavis requests an extension of ten (10) days to file the Record on Appeal which were due by December 9, 2023.

The grounds for this motion are that counsel for the Appellant had confusion about which of the attorneys would be responsible for compiling and filing the Record on Appeal. Through inadvertence of counsel, the Record on Appeal was not timely filed. Further, an additional ten (10) day delay will not prejudice the rights of any other parties. Notice of this Motion has been provided to counsel for the parties herein; however, due to time constraints counsel has not ascertained whether opposing counsel has objection to same. Should the Motion be granted, the Record on Appeal (which is being filed herewith) will be filed with the Court no later than December 29, 2023.

For the stated reasons, Appellant respectfully requests that he be allowed to file the Record on Appeal outside the deadlines until December 29, 2023.

Respectfully submitted,



Daniel L. Draisen SC Bar No. 13536
The Injury Law Firm, P.C.
2006 North Main Street
Anderson, South Carolina 29621

and

Steven M. Krause, SC Bar No.: 3571
Law Offices of Steven M. Krause, PA
207 E. Calhoun Street
Anderson, South Carolina 29621
(864) 225-4000

John S. Nichols, SC Bar # 4210
Bluestein Thompson Sullivan, LLC
1614 Taylor Street
Columbia, SC 29201
Phone: (803) 779-7599
Attorneys for Appellants

December 19, 2023
Anderson, South Carolina

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SC Court of Appeals

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PROOF OF SERVICE

I certify that I served copies of the **Motion to File Outside Deadlines** by e-mail and by United States Mail, postage paid, addressed to:

helen.hiser@mgclaw.com
Zachary.Brown@mgclaw.com
Helen Hiser, Esq.
Zachary S, Brown, Esq.
McAngus, Goudelock & Courie
55 E. Camperdown Way Suite 300
Greenville, South Carolina 29601
Attorneys for the Respondents


Daniel L. Draisen SC Bar No. 13536
The Injury Law Firm, P.C.
2006 North Main Street
Anderson, South Carolina 29621

Dated: December 19, 2023