

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

DeAndra G, Benjamin, Circuit Court Judge

Case No. 2009-CP-18-0452

**RECEIVED**

AUG 15 2013

**SC Court of Appeals**

Rita M. Pugh, ..... Respondent,

v.

Bi-Lo, LLC, ..... Appellant.

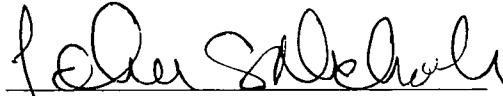
**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, Rita Pugh requests a 30-day extension of the deadline for filing and serving her initial brief and designation of matter to be included in the record on appeal in this case. The current deadline is August 19, 2013. This is the first request for an extension of this deadline by the undersigned attorneys, and the second overall request on Ms. Pugh's behalf.

/Signature page attached

August 15, 2013

Respectfully submitted,



John S. Nichols, SC Bar #4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, SC 29202

(803) 779-7599

(803) 779-8995 (facsimile)

jsnichols@bntdlaw.com

Julio A. Rossington, SC Bar #73905

ROSSINGTON LAW OFFICES, LLC

1317-M N. Main Street, #140

Summerville, SC 29483

(843) 261-1114

julio.rossington@rossingtonlaw.com

Attorneys for Respondent

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

DeAndra G, Benjamin, Circuit Court Judge

---

Case No. 2009-CP-18-0452

---

Rita M. Pugh, ..... Respondent,

v.

Bi-Lo, LLC, ..... Appellant.

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant with a copy of the *Notice of Appearance* and *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Duke R. Highfield, Esquire  
Russell Grainger Hines, Esquire  
Brant R. Horton, Esquire  
Stephen L. Brown, Esquire  
Young Clement Rivers, LLP  
P.O. Box 993  
Charleston, SC 29402

**RECEIVED**

AUG 15 2013

**SC Court of Appeals**



---

Erin Bridges  
Paralegal  
BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC

August 15, 2013  
Columbia, South Carolina



Margaret Miles Bluestein  
John Shannon Nichols  
Stacy Elizabeth Thompson  
John Dennis Delgado  
Allison Paige Sullivan  
Ashley Trout Thompson  
Blake Alexander Hewitt  
Kenneth Henry Dojaquez  
John Clarke Newton

OF COUNSEL  
O. Eugene Powell, Jr.

August 15, 2013

**VIA HAND DELIVERY**

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

RE: Rita M. Pugh v. Bi-Lo, LLC  
Case Tracking No.: 2012-212860

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of a *Notice of Appearance* in regards to this case. Also, please find the original and seven (7) copies of a *Motion for Extension*. I have also enclosed a proof of service of these documents on counsel for the Appellant and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS, THOMPSON &  
DELGADO, LLC

/emb

Enclosures

cc: Julio A. Rossington, Esquire  
Duke R. Highfield, Esquire  
Russell G. Hines, Esquire  
Brant R. Horton, Esquire  
Stephen L. Brown, Esquire