

**RECEIVED**

**Jun 19 2024**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

Ct. App. Case No. 2023-001118  
Civil Case No.: 2021-CP-18-01400

Josue Pineda Orellana, ..... Appellant,

v.

Trident Construction, LLC, ..... Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

COMES NOW the above-named Respondent, pursuant to Rules 240 and 263(b) SCACR, moving this Court for an Order extending the time for filing and serving Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal which are currently due on or before Friday, June 28, 2024. This is Respondent’s second request for an extension.

Because of work-related and other time commitments, the undersigned counsel for Respondent requests the Court’s allowance of thirty (30) days’ additional time to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal. With the extension requested herein, the new deadline for serving/filing the Initial Brief and Designation of Matter would be Monday, July 29, 2024

Counsel for Respondent would show that there is good cause to allow the requested

extension of time, as it is in the furtherance of the interests of justice and will not result in any undue prejudice upon any other party.

This 19<sup>th</sup> day of June, 2024  
Charleston, South Carolina

**Respectfully submitted:**

*/s/ Jaan Rannik*

\_\_\_\_\_  
EPTING & RANNIK, LLC

Jaan G. Rannik

Clinton T. Magill

46A State Street

Charleston, SC 29401

P: (843) 377-1871

F: (843) 377-1310

[jgr@epting-law.com](mailto:jgr@epting-law.com)

[ctm@epting-law.com](mailto:ctm@epting-law.com)

*COUNSEL FOR RESPONDENT*

**RECEIVED**

**Jun 19 2024**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

Ct. App. Case No. 2023-001118  
Civil Case No.: 2021-CP-18-01400

Josue Pineda Orellana, ..... Appellant

v.

Trident Construction, LLC, ..... Respondent

**PROOF OF SERVICE**

I certify that I have served Respondent’s Motion for Extension of Time to File Initial Brief and Designation of Matter, on opposing counsel via e-mail, this 19<sup>th</sup> day of June, 2024, addressed to Appellant’s attorneys of record as follows:

Benjamin A. Parker, Esq. – [benparker@johnpricelawfirm.com](mailto:benparker@johnpricelawfirm.com)

A copy of the e-mail is attached to this Proof of Service as Exhibit A.

By s/Angela  
Angela Gross  
Legal Assistant to  
Jaan G. Rannik  
46A State Street, Charleston, SC 29401  
Phone: 843-377-1871; Fax: 843-377-1310

# EXHIBIT A

**From:** [Angela Gross](#)  
**To:** [Benjamin Parker](#); [Renee Carter](#)  
**Cc:** [Jaan Rannik](#); [Clinton T. Magill](#); [Angela Gross](#)  
**Subject:** Josue Pineda Orellana v. Trident Construction, LLC- 2023-001118  
**Date:** Wednesday, June 19, 2024 12:57:00 PM  
**Attachments:** [2024 06 19 - 2nd Motion for Extension to file Initial Brief.pdf](#)

---

Mr. Parker,

Attached for service please find Respondent's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter in the above-referenced appeal. A Proof of Service will follow under separate email cover.

With kindest regards,



Angela Gross  
Legal Assistant to Andrew K. Epting, Jr., Esq.  
Jaan G. Rannik, Esq.  
Clinton T. Magill, Esq.  
EPTING & RANNIK, LLC  
46A State Street  
Charleston, SC 29401  
Telephone: (843) 377-1871  
Facsimile: (843) 377-1310  
[agg@epting-law.com](mailto:agg@epting-law.com)

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.