

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO  
RESPOND TO RESPONDENT’S INITIAL BRIEF AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD OF APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

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Case No. 2021-CP-18-01400

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Josue Pineda Orellana, Appellant,

v.

John Doe 1-10; Immaculate Reflections, Inc.; Banks Construction Company; Keller North America, Inc., f/k/a Hayward Banker, Inc.; Cooper River Concrete, LLC; Anchor Restoration Contractors, LLC; SC Steel, LLC f/k/a SMI-Owen Steel Company, Inc.; Enloe, Inc.; Ashley Steel, Inc.; Martin Murray Installation LLC; Low Country Case & Millwork, Inc.; Advanced Exterior Systems, LLC; R.W. Ford Company, Inc.; Therm-All, Inc.; Meritage Asset Management, Inc. d/b/a Century Glass; Lowcountry Doors & Hardware, Inc.; Commercial Interiors LLC; Bonitz Contracting Company, Inc.; Polished Concrete Professionals of America, Inc.; Summit Industrial Maintenance, Inc., d/b/a Summit Industrial Flooring; Vulcan Steel Structures, Inc.; All Steel Construction, Inc.; All Plumbing Company, LLC; Design Build Mechanical Corporation; Delta Industrial Electric Company, Defendants,

Of which Trident Construction, LLC is the Respondent.

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NOW COMES the above-named Appellant, pursuant to Rules 240 and 263(b) SCACR, moving this court for an Order extending the time for filing and serving the Appellant's Response to the Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal. which are currently due on or about August 12, 2024. This is the Appellant's first request for an extension.

Because of work-related and other time commitments as well as inclement weather from Tropical Storm Debbie that interfered with travel and electrical power, the undersigned counsel for the Appellant requests the Court's allowance of thirty (30) days' additional time to file and serve its Response to the Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal. With the extension requested herein, the new deadline for serving/filing the Appellant's Response to the Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal would be September 11, 2024.

Counsel for Appellant 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 9<sup>th</sup> day of August, 2024

s/ Benjamin A. Parker  
Benjamin A. Parker  
3045 Ashley Phosphate Rd  
North Charleston, SC 29418  
P: (843) 552-6011  
F: (843) 871-3232  
[benparker@johnpricelawfirm.com](mailto:benparker@johnpricelawfirm.com)  
SC Bar No: 100831

Attorney for Appellant

**RECEIVED**

**Aug 09 2024**

**SC Court of Appeals**

**PROOF OF SERVICE OF APPELLANT'S MOTION FOR EXTENSION  
OF TIME TO RESPOND TO RESPONDENT'S INITIAL BRIEF AND DESIGNATION  
OF MATTER TO BE INCLUDED IN THE RECORD OF APPEAL**

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Of which Trident Construction, LLC is the Respondent.

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PROOF OF SERVICE

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I certify that I have served a copy of Appellant's Motion for Extension of Time to Respond to Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal on Trident Construction, LLC by electronic mail on August 9, 2024, addressed to attorneys of record for Respondent Trident Construction, LLC: Jaan G. Rannik, Esquire, [jgr@epting-law.com](mailto:jgr@epting-law.com) and Clinton T. Magill, Esquire, [ctm@epting-law.com](mailto:ctm@epting-law.com), of Epting & Rannik, LLC.

August 9, 2024

s/ Benjamin A. Parker  
Benjamin A. Parker  
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[benparker@johnpricelawfirm.com](mailto:benparker@johnpricelawfirm.com)  
SC Bar No: 100831

Attorney for Appellant

## Renee Carter

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**From:** Renee Carter  
**Sent:** Friday, August 9, 2024 3:17 PM  
**To:** jgr@epting-law.com; ctm@epting-law.com  
**Cc:** PinedaOreilanaJosuePersonalInjuryZ991261187@johnpricelawfirm.filevineapp.com; agg@epting-law.com; Benjamin Parker  
**Subject:** Josue Pineda Orellana vs. Trident Construction, LLC 2023-001118  
**Attachments:** PINEDA - Appellants Motion for Extension to Respond 080924.pdf

Gentlemen:

Attached for filing are the following documents:

- **Appellate's Motion for Extension to Respond to Respondent's Initial Brief and Designation of Matter to Be Included in the Record of Appeal**

A copy of the Proof of service will be send under separate cover.

**Renee Carter**  
**Litigation Paralegal**  
**JOHN PRICE LAW FIRM, LLC**  
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**N. Charleston, SC 29418**  
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Aug 09 2024

SC Court of Appeals

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August 9, 2024

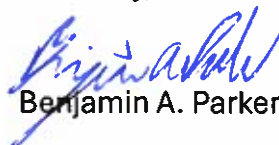
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Josue Pineda Orellana vs. Trident Construction, LLC,  
Appellate Case no: 2023-01118

Dear Ms. Kitchings:

Attached please find a check in the amount of \$50.00 which represents payment of the filing fee for the Appellant's Motion for Extension of Time to Respond to Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal (copy attached) that was filed with the court today, August 9, 2024.

Sincerely,



Benjamin A. Parker

BAP/rc

Enclosure: as stated above

North Charleston<sup>†</sup> Summerville<sup>†</sup> Myrtle Beach<sup>§</sup>

John Price<sup>‡</sup> Bobby Phipps<sup>†</sup> Heather A. Panter, SC, IN<sup>†</sup> J. David Murrell<sup>‡</sup>  
Benjamin A. Parker<sup>‡</sup> Mark A. Redmond<sup>‡</sup> Matthew T. Douglas<sup>†</sup>  
M. Greg McCollum<sup>§</sup> - Of Counsel Frederick "Fritz" Jekel\* - Of Counsel