

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
In The Court of Common Pleas

Courtney Clyburn Pope, Circuit Court Judge

Appellate Case No. 2024-000335

Vernon R. Graham .....Respondent,

v.

Carolina Tractor & Equipment Company, Inc.  
and Lonnie Dr. Gates ..... Defendants,

of which Carolina Tractor and  
Equipment is the .....Appellant.

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

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent  
Vernon R. Graham respectfully requests a thirty-day (30-day) extension to file and serve  
his Initial Brief and Designation of Matter.

This request is based on the grounds that Respondent’s counsel is currently  
managing a significant workload, including numerous depositions – both previously  
scheduled and newly arranged on short notice – in preparation for trial, as well as  
mediations and pending motions. Additionally, personal family obligations have  
occupied the past several weekends and continue through the upcoming Labor Day

weekend. Respondent's counsel has remained diligent in preparing Respondent's Initial Brief and Designation of Matter; however, additional time is needed to finalize them.

For the foregoing reasons, the undersigned counsel respectfully requests a thirty (30) day extension, which would extend the deadline for filing and serving Respondent's Initial Brief and Designation of Matter from September 3, 2024, to **October 2, 2024**. This is Respondent's second and final request for an extension to file his Initial Brief and Designation of Matter.

Respondent sincerely appreciates the Court's time, attention and consideration of this motion.

Respectfully submitted,

*s/W. Hugh McAngus, Jr.*

W. Hugh McAngus, Jr. (S.C. Bar No. 74941)

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

Columbia, South Carolina  
August 27, 2024

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Appellate Case No. 2024-000335

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Carolina Tractor & Equipment Company, Inc.  
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of which Carolina Tractor and  
Equipment is the .....Appellant.

**PROOF OF SERVICE**

I hereby certify that I have caused to be served Respondent’s Second Motion for Extension of Time to File Respondent’s Initial Brief and Designation of Matter upon all parties, by electronic mail to all counsel of record on August 27, 2024, addressed to the following:

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**PROOF OF SERVICE FOR  
RESPONDENT'S SECOND MOTION FOR  
EXTENSION OF TIME TO FILE INITIAL  
BRIEF AND DESIGNATION OF MATTER**

Columbia, South Carolina  
August 27, 2024