

RECEIVED

Oct 03 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Circuit Court Case No. 2023-CP-40-04606
Appellate Case No. 2024-001435

LATONYA MARIE MILLER-HEMINGWAY,.....Respondent,

v.

U-HAUL CO. OF SOUTH CAROLINA, INC., d/b/a/ U-HAUL MOVING
& STORAGE OF SPRING VALLEY,.....Appellant.

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER ON APPEAL**

Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, Appellant U-Haul Co. of South Carolina, Inc. d/b/a U-Haul Moving & Storage of Spring Valley, through undersigned counsel, respectfully requests a thirty (30) day extension of time to file Appellant’s Initial Brief and Designation of Matter on Appeal. The Initial Brief and Designation of Matter on Appeal is currently due October 23, 2024. With a 30-day extension of time, the extended deadline would be November 22, 2024.

Undersigned counsel for the Appellant submit that they have multiple court hearings, mediations, depositions, pleading deadlines, and discovery deadlines calendared in pending matters prior to the current deadline of October 23, 2024. Accordingly, this extension is requested to ensure that the Appellant has adequate time to prepare its Initial Brief and

Designation of Matter on Appeal. There have been no other extensions requested or granted in this matter to date.

Undersigned counsel for the Appellant have conferred with counsel for the Respondent prior to filing this motion, and counsel for the Respondent consents to the requested extension.

Respectfully submitted,

Dated: October 3, 2024

/s/ Matthew Anderson
Ellis & Winters LLP
S.C. State Bar No. 101020
P.O. Box 2752
Greensboro, North Carolina 27402
Telephone: (336) 389-5693
Facsimile: (336) 217-4198
matthew.anderson@elliswinters.com

Ashley K. Brathwaite
S.C. State Bar No. 76952
Ellis & Winters LLP
P.O. Box 33550
Raleigh, North Carolina 27636
Telephone: (919) 865-7000
Facsimile: (919) 865-7010
ashley.brathwaite@elliswinters.com

Counsel for Appellant

RECEIVED

Oct 03 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Circuit Court Case No. 2023-CP-40-04606
Appellate Case No. 2024-001435

LATONYA MARIE MILLER-HEMINGWAY,.....Respondent,

v.

U-HAUL CO. OF SOUTH CAROLINA, INC., d/b/a/ U-HAUL MOVING
& STORAGE OF SPRING VALLEY,.....Appellant.

PROOF OF SERVICE

I hereby certify that a copy of the Motion for Extension of Time to File Initial Brief and Designation of Matter on Appeal submitted by Appellant was sent to counsel for the Respondent, by United States Mail, postage prepaid, and by email, addressed as follows:

J. Andrew Delaney
WILLIAMS & WILLIAMS
P.O. Box 1084
Orangeburg, South Carolina 29116
andy@williamsattys.com

Dated: October 3, 2024

/s/ Lindsay Bray

Lindsay Bray
Legal Assistant to Matthew Anderson, Esq.