

**RECEIVED**

**Nov 07 2024**

**SC Court of Appeals**

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

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

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Appellate Case No. 2024-001012  
Case No. 2022-CP-23-056246

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Chris Williams,

Appellant,

versus

applya Occupational Strategies, LLC, Felix Mirando,  
Tom Baumgarten, and Andrew Garnock,

Respondents.

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**SECOND MOTION FOR EXTENSION OF TIME**

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Respondents, applya Occupational Strategies, LLC, Felix Mirando, and Tom Baumgarten, respectfully request a thirty (30) day extension of time to file their initial brief. The current deadline for the Respondents' initial brief is November 13, 2024. With a thirty (30) day extension, the new deadline for Respondents' initial brief is December 13, 2024. Respondents request this extension because Respondents have retained new appellate counsel, as indicated below, and Respondents' new counsel needs additional time to prepare Respondents' initial brief. This is Respondents' second request for an extension of this deadline. Appellant consents to this request. Respondents request the current deadline be held in abeyance until this Court issues an order on this motion.

Respectfully submitted,

s/Adam C. Bach

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Adam C. Bach (#74885)  
Emily R. Godwin (#103708)  
TONNSEN BACH, LLC  
1306 South Church Street  
Greenville, SC 29605  
Telephone: (864) 236-5013  
Facsimile: (864) 312-4191  
*abach@tonnsenbach.com*  
*egodwin@tonnsenbach.com*

Fred W. "Trey" Suggs III, SC Bar #70222  
CASSIDY COATES PRICE, P.A.  
P. O. Box 10529  
Greenville, SC 29603  
Telephone: (864) 349-2600  
Facsimile: 864) 349-0303  
*tsuggs@cassidycoates.com*

ATTORNEYS FOR RESPONDENTS APPLYA  
OCCUPATIONAL SERVICES, LLC, FELIX  
MIRANDO, AND TOM BAUMGARTEN

November 7, 2024

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**PROOF OF SERVICE**

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The undersigned employee of Tomnsen Bach, LLC hereby certifies that on **November 7, 2024**, I served counsel of record in the above-entitled action with a copy of the Second Motion for Extension by electronic mail using their primary email address pursuant to Rule 262 of the South Carolina Appellate Court Rules, as follows:

Paul S. Landis, SC Bar #76120  
*paul@fayssouxlaw.com*  
ATTORNEY FOR APPELLANT

John F. Connell, Jr., SC Bar #101701  
*jconnell@burr.com*  
ATTORNEY FOR APPELLANT

*Signature page follows*

TONNSEN BACH, LLC



Trina Kolenich, Litigation Assistant  
*tkolenich@tonnsenbach.com*

**November 7, 2024**

Greenville, South Carolina