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Nov 18 2024

SC Court of Appeals

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

Appeal from Lancaster County
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-29-00240
Appellate Case No. 2023-001980

Jenna Robbins,

Appellant,

v.

IMF13, LLC d/b/a The Indigo at Cross Creek, Taft Management Group, Taft Family Ventures, Southern-eez Landscaping, LLC, and Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping,

of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

**SECOND MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF RESPONDENT**

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Attorneys for Respondent

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for a second extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed October 18, 2024, the deadline for Respondent's initial brief and designation of matter is November 18, 2024. On account of work-related and other time commitments (including an unplanned medical procedure), Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

The undersigned counsel consulted with counsel for Appellant and has been advised that Appellant's counsel has no objection to this request.

WHEREFORE, Respondent moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving the initial brief and designation of matter would be December 18, 2024, according to the undersigned's calculations.

Further, Respondent respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

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Attorneys for Respondent

Charleston, South Carolina

November 18, 2024

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of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

PROOF OF SERVICE

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Attorneys for Respondent

I, Catherine H. Chase, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that Respondent's **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on November 18, 2024, via email (see attached) to their following counsel of record:

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Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Catherine H. Chase
Catherine H. Chase (SC Bar No. 74593)
Attorney for Respondent

Charleston, South Carolina

Dated: November 18, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: drew@radekerlaw.com; drew@wdwlawfirm.com; kyle@wdwlawfirm.com; [Brian Wolfe](#); [Robert Gunst](#); [Josh Hinson](#)
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Subject: Robbins v. IMF13, LLC; Appellate Case No. 2023-001980 (CR 230494)
Date: Monday, November 18, 2024 10:34:20 AM
Attachments: [2nd Motion for Extension - Initial Brief.pdf](#)
[image001.png](#)

Enclosed please find Respondent's Second Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

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