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**Nov 19 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

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

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

v.

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

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

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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 twenty-one (21) 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 November 25, 2024. With a 21-day extension of time, the extended deadline would be December 16, 2024.

Appellant has previously requested, and this Court has granted, one 30-day extension of this deadline. Since that extension was granted, undersigned counsel for the Appellant and counsel for the Appellee have engaged in negotiations to settle and resolve this matter, and those

negotiations are ongoing. Undersigned counsel believe that, with the additional time sought through this motion, the parties are likely to reach an agreement that will render this appeal moot, and result in a voluntary dismissal. Accordingly, this extension is requested to ensure that the parties have adequate time to reach a resolution without incurring further costs and expense that would complicate these ongoing settlement discussions.

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: November 19, 2024

/s/ Matthew Anderson  
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Counsel for Appellant

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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 Second 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:

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Dated: November 19, 2024

/s/ Lindsay Bray

Lindsay Bray  
Legal Assistant to Matthew Anderson, Esq.