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Dec 03 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

The Honorable Jennifer B. McCoy, Circuit Court Judge

Case No. 2022-CP-10-05916
Appellate Case No. 2024-001248

Marka Daniella Rodgers.....Appellant,

v.

CNT Foundations.....Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE ITS
INITIAL BRIEF OF RESPONDENT**

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Attorney for Respondent

NOW COME Respondent CNT Foundations, by and through its undersigned counsel, and respectfully moves before this Honorable Court for an extension of thirty (30) days to file and serve its *Initial Brief of Respondent* upon Appellant and file same along with the accompanying

Proof of Service. Respondent's *Initial Brief of Respondent* is due to be served on all parties and filed on or before December 6, 2024. Respondents move for the due date to be extended to January 6, 2024. The basis for this Motion is that due to Respondent's counsel's lingering health issues, case load and complexity of the issues, additional time is needed to complete the *Initial Brief of Respondent*. This matter has been ongoing as of December 27, 2022, and Respondent is of the belief that an extension to file its *Initial Brief of Respondent* will not prejudice Appellant.

WHEREFORE, for all the foregoing reasons, Respondents respectfully move this Honorable Court to grant an extension of an additional 30 days to file and serve its *Initial Brief of Respondent* with the Court. With the requested extension of time, the new deadline will be January 6, 2024. Additionally, Respondent respectfully requests that the Court hold its present deadline for the service and filing of Respondent's *Initial Brief of Respondent* in abeyance until it acts upon this Motion.

Respectfully submitted,

s/ Charles A. Krawczyk

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Appeal from Charleston County
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The Honorable Jennifer B. McCoy, Circuit Court Judge
Trial Court Case No. 2022-CP-10-05916

Appellate Case No 2017-005916

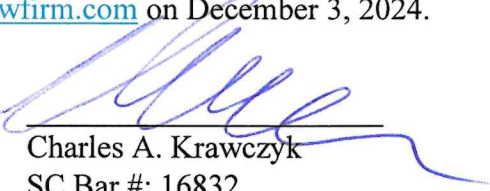
Marka Danielle Rodgers, Appellant

v.

CNT Foundations, LLC, Respondent

PROOF OF SERVICE

I certify that I have served Respondents' Motion for Extension of Time to File and Serve Its Initial Brief of Respondent on Marka Danielle Rodgers, by electronic mail to their attorney of record, Daniel Summa, Esquire, daniel@summalawfirm.com on December 3, 2024.



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