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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.

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL
BRIEF OF RESPONDENT, APPELLANT’S REPLY, RECORD ON APPEAL AND
FINAL BRIEFS**

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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 moves for the due date to be extended to January 6, 2024, thereby tolling all associated deadlines including the filing of Appellant's Reply, the Record on Appeal, and the Final Briefs until that time. 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*. Additionally, Appellant's counsel will be on secured designated leave from January 6, 2025 to January 24, 2025. Both Counsel for Appellant, Daniel Summa, and Counsel for Respondent, Charles Krawczyk, have consented to this request.

WHEREFORE, Respondent respectfully requests that it be granted an additional thirty (30) days to file and serve its *Initial Brief of Respondent*. With the requested extension of time, the new due date for these pleadings will be January 6, 2025.

We consent,

/s/ Daniel Summa

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December 3, 2024

s/ Charles A. Krawczyk

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Appellate Case No 2017-005916

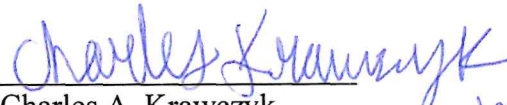
Marka Danielle Rodgers, Appellant

v.

CNT Foundations, LLC, Respondent

PROOF OF SERVICE

I certify that I have served Consent Motion for Extension of Time 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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