

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Dec 31 2024

SC Court of Appeals

Thomas W. McGee, III, Circuit Court Judge

Appellate Case No. 2024-002036

Robert C. Workman, Individually and as
Personal Representative of the Estate of
James K. Workman, Kelly Workman Tick
and Matthew T. Workman,
.....Plaintiffs/Appellants,

v.

State Farm Mutual Automobile Insurance
Company and Gallivan, White & Boyd, P.A.Defendants.

of which

State Farm Mutual Automobile Insurance Company is the
.....Defendant/Respondent.

**APPELLANTS' MOTION FOR EXTENSION TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER**

WHEREAS Appellant's Brief and Designation of Matter for Inclusion in the
Record on Appeal is due to be filed on or about Jan. 3, 2025 counsel for Appellant
needs an extension of time to file the Initial Brief as well as Designation of Matter

to be Included in the Record on Appeal due to various reasons, including that there have been various holidays and time spent with family, counsel having to prepare and teach various CLE programs, counsel's long time paralegal of 25 years passed away and he attended her funeral yesterday and counsel has otherwise has limited time to file said documents;

Counsel for Appellant hereby moves pursuant to Rule 240(a) for an extension of time to allow Appellant to file her Initial Brief and Designation of Matter to be Included in the Record on Appeal in this matter no later than February 14, 2025.

KAHN LAW FIRM, LLP

/s/ JUSTIN S. KAHN
JUSTIN S. KAHN
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ATTORNEYS FOR APPELLANTS

DECEMBER 31, 2024

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PROOF OF SERVICE

I certify that I have served the Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter on counsel for State Farm Mutual Automobile Insurance Company by filing the document with the Clerk of Court which acts as service and depositing a copy of it in the United States Mail, postage

prepaid, on December 31, 2024 addressed to its attorneys of record M. Kathleen McTighe Mellen, Esq. and Robert W. Whelan, Esq., 89 Broad Street Charleston, SC 29401.

s/ Justin S. Kahn
Justin S. Kahn
jskahn@kahnlawfirm.com
Kahn Law Firm, LLP
PO Box 31397
Charleston, South Carolina 29417
843.577.2128
Attorneys for Appellants

DECEMBER 31, 2024

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Charleston, SC 29417-1397
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Pinnacle™

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12/31/2024

PAY TO THE ORDER OF SC Court of Appeals

\$**50.00

Fifty and 00/100***** DOLLARS

SC Court of Appeals



AUTHORIZED SIGNATURE

MEMO Case: 2024-002036, Motion for Extension

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Kahn Law Firm, LLP

SC Court of Appeals

12/31/2024

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CLIENT EXPENSES:LLP Client Cost Advance Motopn for Extension, SC Court of Appeals
Case: 2024-002036,

50.00

LLP Operating Account Case: 2024-002036, Motion for Extension 50.00

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December 31, 2024

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
Dec 31 2024
SC Court of Appeals

Re: Robert C. Workman v. State Farm Mutual Automobile Insurance Company
Appellate Case No. 2024-002036

Dear Clerk of Court:

Enclosed for filing and consideration is Appellants' motion for extension of time to file the initial brief; designation of matter along with proof of service and a check for \$50.00 for the motion.

Thank you very much.

Respectfully,
/s Justin S. Kahn

cc: M. Kathleen McTighe Mellen, Esq.
Robert W. Whelan, Esq.