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**Jan 14 2025**

**SC Court of Appeals**

IN 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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**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
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, Respondent Latonya Marie Miller-Hemmingway, through her undersigned counsel, requests a thirty (30) day extension to file Respondent’s Response to Initial Brief and Designation of Matter of Appeal. The Initial Brief and Designation of Matter of Appeal was served on Respondent on December 16, 2024. The Respondent’s response is currently due January 15, 2025. With a 30-day extension of time, the extended deadline would be February 14, 2025.

Respondent, by and through her counsel, have engaged in negotiation to settle and resolve this matter, and those negotiations are ongoing. Undersigned counsel believes 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 expenses that would complicate these ongoing settlement discussions.

Undersigned counsel for the Respondent has conferred with counsel for the Appellant prior to filing this motion, and counsel for the Appellant consents to the requested extension.

Respectfully submitted,

Dated: January 14, 2025

*s/J. Andrew Delaney*  
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