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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Circuit Court Judge

Case No. 2021-CP-10-01711
Appellate Case No. 2025-000089

John Michael Barnett.....Respondent,

v.

CNT Foundations, LLC and Christopher T. Bedson, Defendants,
of which CNT Foundations, LLC is Appellant.....Appellant.

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

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Attorney for Appellant

NOW COME Appellant CNT Foundations, LLC, 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 Appellant* upon Respondent and file same along with the accompanying *Proof of Service*. Appellant's *Initial Brief of Appellant* is due to be served on all parties and filed on or before February 14, 2025. Appellant moves for the due date to be extended to March 17, 2025. The basis for this Motion is that due to Appellant's counsel's lingering health issues, case load and complexity of the issues, additional time is needed to complete the *Initial Brief of Appellant*. This matter has been ongoing as of April 14, 2021, and Appellant is of the belief that an extension to file its *Initial Brief of Appellant* will not prejudice Respondent.

WHEREFORE, for all the foregoing reasons, Appellant respectfully moves this Honorable Court to grant an extension of an additional 30 days to file and serve its *Initial Brief of Appellant* with the Court. With the requested extension of time, the new deadline will be March 17, 2025. Additionally, Appellant respectfully requests that the Court hold its present deadline for the service and filing of Appellant's *Initial Brief of Appellant* in abeyance until it acts upon this Motion.

Respectfully submitted,

s/ Charles A. Krawczyk
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February 4, 2025

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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

The Honorable Mikell R. Scarborough, Circuit Court Judge
Trial Court Case No. 2021-CP-10-01711

Appellate Case No 2025-000089

John Michael Barnett.....Respondent

v.

CNT Foundations, LLC and Christopher T. Bedson, Defendants
of which CNT Foundations, LLC is Appellant.....Appellant

PROOF OF SERVICE

I certify that I have served Appellant’s Motion for Extension of Time to File and Serve Its Initial Brief of Appellant on John Michael Barnett, by electronic mail to their attorney of record, Stanley E. Barnett, Esquire, stan.barnett@yahoo.com and stan.barnett@comcast.net on February 4, 2025.

s/ Charles A. Krawczyk
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