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Feb 13 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Circuit Court Case No. 2023-CP-40-04606  
Appellate Case No. 2024-001435

LATONYA MARIE MILLER-HEMINGWAY,.....Respondent,

v.

U-HAUL CO. OF SOUTH CAROLINA, INC. d/b/a U-HAUL MOVING  
& STORAGE OF SPRING VALLEY,.....Appellant.

**RESPONDENT’S SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONSE  
TO INITIAL BRIEF AND DESIGNATION OF MATTER ON APPEAL**

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. A settlement has been reached and both parties require an extension to complete the settlement process. The Respondent’s response is currently due February 14, 2025. With a 30-day extension of time, the extended deadline would be March 14, 2025.

Respondent, by and through her counsel, have engaged in negotiations to settle and have come to a resolution. Undersigned counsel believes that, with the additional time sought through this motion, the parties are likely to have completed the settlement process, and result in a voluntary dismissal. Accordingly, this extension is requested to ensure that the parties have adequate time to

finalize the settlement 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: February 13, 2025

*s/J. Andrew Delaney*  
J. Andrew Delaney, Esquire  
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Counsel for Respondent

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**PROOF OF SERVICE**

I hereby certify that copies of the **Respondent's Second Request for Extension to File Response to Initial Brief and Designation of Matter on Appeal** was served on counsel for the Appellant, by United States Mail, postage prepaid, and/or by email, addressed as follows:

Matthew Anderson  
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February 13, 2025

s/ Drew C. Carroll  
Drew C. Carroll  
Paralegal to J. Andrew Delaney