

August 12, 2025

VIA EMAIL ONLY- ctappfilings@sccourts.org

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

Aug 12 2025

SC Court of Appeals

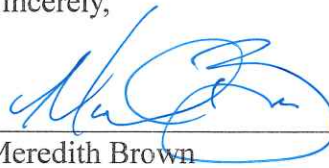
RE: Shirley Reed vs OHM Florence, LLC
Appellate Case No.: 2025-001115

Dear Ms. Kitchings,

Please find enclosed for filing Respondent's Motion for Extension to file the Initial Brief and Designation of Matter, in reference to the above matter. Also, attached separately is a Notice of Appearance for John S. Nichols. I have enclosed a proof of service of these documents on counsel for the Appellant. The \$50.00 filing fee check will be delivered within five (5) days of this letter by USPS mail.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Meredith Brown
Legal Assistant to John S. Nichols, Esq.
Bluestein Thompson Sullivan, LLC

/mb

Enclosures

cc: John S. Nichols, Esq. (john@bluesteinattorneys.com)
J. Clarke Newton, Esq. (clarke@bluesteinattorneys.com)
Rodney C. Jernigan, Jr., Esq. (rod@jerniganlaw.net)
J. David Banner, Esq. (jdb@aikenbridges.com)
Robert H. Hood, Jr., Esq. (bobbyjr.hood@hoodlaw.com)
Ryan C. Holt, Esq. (rhc@swblaw.com)
Brian L. Craven, Esq. (blc@swblaw.com)
Madison K. Kea, Esq. (mkk@swblaw.com)
Daniel Q. Atkinson, Esq. (dqa@swblaw.com)

COLUMBIA:

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Aug 12 2025

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Haigh Porter, Master-in-Equity

SC Court of Appeals

Appellate Case No.: 2025-001115
Civil Action No.: 2024-CP-21-00548

Shirley Reed,..... Respondent,

vs.

OHM Florence, LLC,..... Appellant.

**RESPONDENTS' MOTION FOR EXTENSION
TO FILE INITIAL BRIEF**

Pursuant to Rule 263(b), SCACR, Respondent Shirley Reed moves for an extension of time to file and serve the Initial Brief for the Respondent. Respondent consulted with Appellant's counsel who consents to this request.

Respondent respectfully requests that the Court grant an extension due to professional and personal obligations and advise Respondent of the date the Initial Brief would then be due. Unless otherwise ordered, a thirty-day extension would extend the time for serving and filing to September 15, 2025.

Respectfully submitted,

August 12, 2025



John S. Nichols, Esq.

J. Clarke Newton, Esq.

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Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Appellate Case No.: 2025-001115
Civil Action No.: 2024-CP-21-00548

Shirley Reed,.....Respondent,

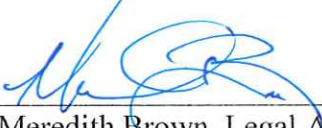
vs

OHM Florence, LLC,.....Appellant.

NOTICE OF APPEARANCE

Please note the appearance of John S. Nichols as counsel on behalf of the Respondent in the above- referenced action.

Respectfully Submitted,



Meredith Brown, Legal Assistant to
John S. Nichols, Esq.
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August 12, 2025

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Haigh Porter, Master-in-Equity

Appellate Case No.: 2025-001115
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SC Court of Appeals

Shirley Reed,..... Respondent,

vs.

OHM Florence, LLC,..... Appellant.

PROOF OF SERVICE

I certify that I have served the Respondent's Motion for Extension to file the Initial Brief and Designation of Matter and the Notice of Appearance on behalf on John S. Nichols upon the Appellant OHM Florence, LLC, by electronic mail on August 12, 2025, addressed to their attorneys of record as follows:

Sweeny, Wingate & Barrow, P.A.
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Attorneys for Appellant



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August 12, 2025

Meredith Brown

From: Meredith Brown
Sent: Tuesday, August 12, 2025 4:11 PM
To: rch@swblaw.com; blc@swblaw.com; mkk@swblaw.com; dqa@swblaw.com; bobbyjr.hood@hoodlaw.com; jdb@aikenbridges.com
Cc: John Nichols; Clarke Newton; rod@jerniganlaw.net
Subject: S. Reed v OHM Florence, Inc- Notice of Appearance and Motion for Extension- Case No: 2025-001115
Attachments: 2025.08.12- NOA for JSN- S Reed v OHM Florence, Inc.pdf; 2025.08.12- Motion for Extension- S Reed v OHM Florence, Inc.pdf

Dear Counsel,

Please find enclosed the Notice of Appearance for John S. Nichols and a Motion for Extension, in the above-referenced matter.

Thank you,
Meredith



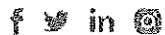
**MEREDITH BROWN OFFICE MANAGER &
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