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Aug 25 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Marvin H. Dukes, III, Circuit Court Judge

Appellate Case No. 2025-000941
Lower Court Case No. 2023-CP-10-00914

Lisa Renee Sample, Appellant,

v.

Blood Connection, Inc. and Delisha K. English, of which Blood Connection, Inc. is the Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF

Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for the Respondent respectfully requests an extension of the deadline to file the Respondent's brief from August 29, 2025 until September 29, 2025. This is the first such request and is made in good faith and not for the purpose of delay. The grounds for this request are that, in light of their summer schedules and the other demands of their practices, counsel for the Respondent needs additional time to prepare its brief. The undersigned consulted with counsel for Appellant, who has no objection to this Motion.

[Signature on following page]

s/ Lillian Keeling

Fred W. "Trey" Suggs III, SC Bar No. 70222

Lillian K.H. Keeling, SC Bar No. 106490

Cassidy Coates Price, P.A.

1052 N. Church Street (29601)

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Greenville, SC 29603

(864) 349-2616

Attorneys for The Blood Connection, Inc.

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PROOF OF SERVICE

I, the undersigned, do hereby state that I have on August 25, 2025 served copies of the **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF** upon all other parties, through their attorney(s) of record, via electronic mail using the e-mail addresses listed in the Attorney Information System (AIS). A copy of the sent e-mail is enclosed with this Proof of Service.

s/ Lillian Keeling

Fred W. "Trey" Suggs III, SC Bar No. 70222

Lillian K.H. Keeling, SC Bar No. 106490

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Greenville, SC 29603

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Attorneys for The Blood Connection, Inc.

From: [Lillian Keeling](#)
To: [Adam Ruffin](#)
Cc: [Greg Keith](#); [Jonathan Krell](#)
Subject: RE: Sample v. TBC - Respondent's Motion for Extension
Date: Monday, August 25, 2025 10:07:26 AM
Attachments: [Respondent's Motion for Extension.pdf](#)
[image001.png](#)

Please find attached for service our Motion for Extension of Time, which will be filed with the Court of Appeals shortly.

Thanks,
Lillian

Lillian K. H. Keeling

Attorney

e lkeeling@cassidycoates.com

d 864.349.2605



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From: Lillian Keeling

Sent: Monday, August 25, 2025 9:52 AM

To: Adam Ruffin <adam@ruffinappeals.com>

Cc: Greg Keith <greg@uricchio.com>; Jonathan Krell <jonathan@uricchio.com>

Subject: RE: Sample v. TBC - Respondent's Motion for Extension

Thanks! Have a great week.

Lillian K. H. Keeling

Attorney

e lkeeling@cassidycoates.com

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penalties posed under the Internal Revenue Code.

From: Adam Ruffin <adam@ruffinappeals.com>
Sent: Monday, August 25, 2025 9:46 AM
To: Lillian Keeling <lkeeling@cassidycoates.com>
Cc: Greg Keith <greg@uricchio.com>; Jonathan Krell <jonathan@uricchio.com>
Subject: Re: Sample v. TBC - Respondent's Motion for Extension

Yes we consent to the extension. Thank you!

Adam

From: Lillian Keeling <lkeeling@cassidycoates.com>
Sent: Monday, August 25, 2025 9:13 AM
To: Adam Ruffin <adam@ruffinappeals.com>
Cc: Greg Keith <greg@uricchio.com>; Jonathan Krell <jonathan@uricchio.com>
Subject: Sample v. TBC - Respondent's Motion for Extension

Good Morning Adam,

I plan on filing a motion for a 30-day extension for our response brief in *Sample*. May I include in the motion that you have no objection?

Thanks,
Lillian

Lillian K. H. Keeling

Attorney

e lkeeling@cassidycoates.com

d 864.349.2605



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