

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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

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

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SEP 02 2025  
SC Court of Appeals

Lisa Renee Sample, Appellant,

v.

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

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF**

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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)

Post Office Box 10529

Greenville, SC 29603

(864) 349-2616

*Attorneys for The Blood Connection, Inc.*

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**PROOF OF SERVICE**

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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

Cassidy Coates Price, P.A.

1052 N. Church Street (29601)

Post Office Box 10529

Greenville, SC 29603

(864) 349-2616

*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](#)

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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](mailto:lkeeling@cassidycoates.com)

d 864.349.2605

### CASSIDY COATES PRICE

1052 North Church Street, Greenville, SC 29601

P.O. Box 10529, Greenville, SC 29603

p 864.349.2600 | f 864.349.0303

[cassidycoates.com](http://cassidycoates.com)

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contained in this e-mail or any attachment hereto is not intended to be used, and cannot be used, to avoid penalties posed under the Internal Revenue Code.

---

**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](mailto:lkeeling@cassidycoates.com)

d 864.349.2605

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1052 North Church Street, Greenville, SC 29601

P.O. Box 10529, Greenville, SC 29603

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penalties posed under the Internal Revenue Code.

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**From:** Adam Ruffin <[adam@ruffinappeals.com](mailto:adam@ruffinappeals.com)>  
**Sent:** Monday, August 25, 2025 9:46 AM  
**To:** Lillian Keeling <[lkeeling@cassidycoates.com](mailto:lkeeling@cassidycoates.com)>  
**Cc:** Greg Keith <[greg@uricchio.com](mailto:greg@uricchio.com)>; Jonathan Krell <[jonathan@uricchio.com](mailto: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](mailto:lkeeling@cassidycoates.com)>  
**Sent:** Monday, August 25, 2025 9:13 AM  
**To:** Adam Ruffin <[adam@ruffinappeals.com](mailto:adam@ruffinappeals.com)>  
**Cc:** Greg Keith <[greg@uricchio.com](mailto:greg@uricchio.com)>; Jonathan Krell <[jonathan@uricchio.com](mailto: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](mailto:lkeeling@cassidycoates.com)

d 864.349.2605

 **CASSIDY COATES PRICE**

1052 North Church Street, Greenville, SC 29601

P.O. Box 10529, Greenville, SC 29603

p 864.349.2600 | f 864.349.0303

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August 25, 2025

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Jenny Abbott Kitchings  
Clerk, The Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: Lisa Renee Sample v. The Blood Connection Inc.  
C.A. No. 2023CP1000914; CCP No.: 4023.0002**

Dear Madam Clerk:

Enclosed please find the Respondents' Motion for Extension of Time to File the Respondents' Initial Brief and Designation of Matter for the Record on Appeal. Additionally, I have included a Certificate of Service, and a check for the filing cost associated with this Motion.

Please let me know if you have any questions regarding the enclosed.

Sincerely,

CASSIDY COATES PRICE, P.A.



Becca Pharr, Paralegal to  
Fred W. "Trey" Suggs III and Lillian K. H. Keeling

/bep

Enclosures

 CASSIDY COATES PRICE

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Greenville, SC 29603

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