

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Sep 24 2025

SC 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.

SECOND 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 September 29, 2025 to October 29, 2025. This is the second 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 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 consented 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.

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Attorneys for The Blood Connection, Inc.

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PROOF OF SERVICE

I, the undersigned, do hereby state that I have on September 24, 2025 served copies of the **SECOND 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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Attorneys for The Blood Connection, Inc.

From: [Lillian Keeling](#)
To: "Adam Ruffin"
Subject: RE: Sample v. TBC - Respondent's Second Motion for Extension
Date: Wednesday, September 24, 2025 3:50:00 PM
Attachments: [Respondent's Second Motion for Extension.pdf](#)
[image001.png](#)

Thanks so much, Adam. Attached for service please find the motion that we will be filing shortly.

Have a great rest of your week,
Lillian

Lillian K. H. Keeling

Attorney

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From: Adam Ruffin <adam@ruffinappeals.com>
Sent: Wednesday, September 24, 2025 3:46 PM
To: Lillian Keeling <lkeeling@cassidycoates.com>
Subject: Re: Sample v. TBC - Respondent's Second Motion for Extension

Hey Lillian,

No problem at all. Yes you can put that we consent to the motion. Thanks!

Adam

From: Lillian Keeling <lkeeling@cassidycoates.com>
Sent: Wednesday, September 24, 2025 3:40 PM
To: Adam Ruffin <adam@ruffinappeals.com>
Subject: Sample v. TBC - Respondent's Second Motion for Extension

Hi Adam,

I hope all is well. I hate to do it, but I'm going to request one more 30-day extension for our response brief in *Sample*. May I include in the motion that you have no objection? I wasn't planning on needing it, but I could use a little bit of extra time due to the amount of traveling I've had to do this past month.

Thanks,
Lillian

Lillian K. H. Keeling

Attorney

e lkeeling@cassidycoates.com

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