

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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

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**RECEIVED**

**Oct 15 2025**

**SC Court of Appeals**

Shirley Reed,

Respondent,

v.

OHM Florence, LLC,

Appellant,

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**APPELLANT’S MOTION FOR EXTENSION  
TO FILE INITIAL REPLY BRIEF**

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Pursuant to Rule 263(b), SCACR, Appellant OHM Florence, LLC hereby moves to extend the time to file and serve the Initial Reply Brief of Appellant by thirty (30) days. Appellant makes this request for extension by reason of professional obligations of the undersigned which create a need for additional time to prepare Appellant’s initial reply brief.

The current due date for serving and filing the initial reply brief is October 20, 2025. If this motion for extension were granted, the new due date would be November 19, 2025.

Respectfully submitted,

s/Daniel Q. Atkinson  
Sweeny Wingate & Barrow, P.A.  
Ryan C. Holt  
Brian L. Craven  
Madison K. Kea  
Daniel Q. Atkinson

1515 Lady Street  
Columbia, SC 29201  
(803) 256-2233

Hood Law Firm, LLC  
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*Attorneys for Appellant*

October 15, 2025

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**PROOF OF SERVICE**

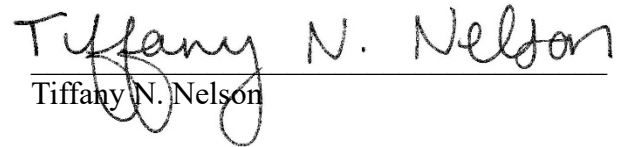
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I, the undersigned legal assistant of the law offices of Sweeny, Wingate & Barrow, P.A., attorneys for Appellant OHM Florence, LLC, do hereby certify that I have served Appellant's Motion for Extension to File Initial Reply Brief upon Respondent Shirley Reed by electronic mail on October 15, 2025, addressed to her attorneys of record as follows:

Bluestein Thompson Sullivan, LLC  
John S. Nichols  
J. Clarke Newton  
PO Box 7965  
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*Attorneys for Respondent*

  
\_\_\_\_\_  
Tiffany N. Nelson

October 15, 2025



SWEENY WINGATE & BARROW

October 15, 2025

Reply to: Main Office

**Daniel Q. Atkinson**  
(803) 256-2233  
dqa@swblaw.com

**VIA E-FILING AND HAND DELIVERY: ctappfilings@sccourts.org**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
**Oct 15 2025**  
**SC Court of Appeals**

RE: Reed v. OHM Florence, LLC d/b/a Thunderbird Country Buffet  
Appellate Case No.: 2025-01115  
Our File: 1080-15485

Dear Ms. Kitchings:

Please find attached for electronic filing a copy of Appellant's Motion for Extension to File Initial Reply Brief and Proof of Service in the above-referenced matter. Hand-delivered with a copy of this letter (without enclosures) is a check for the \$50.00 filing fee. Please let me know if anything further is required from Appellant OHM Florence, LLC concerning this motion.

Yours truly,

**SWEENY, WINGATE & BARROW, P.A.**

*s/ Daniel Q. Atkinson*  
Daniel Q. Atkinson  
Associate

DQA/tnn