

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas  
S. Bryan Doby, Circuit Court Judge  
First Judicial Circuit

---

Case No. 2024-CP-18-01640

---

Gilbert Anthony E. Valdez, Plaintiff

---

v.

John P. Murray d/b/a Johnny's Marine, Defendant

Of whom, Gilbert Anthony E. Valdez is the Respondent and John P. Murray d/b/a Johnny's Marine is the Appellant.

---

APPELLANT'S MOTION TO FILE RECORD ON APPEAL OUTSIDE OF DEADLINE

---

Appellant, by and through undersigned counsel, hereby moves this Court for an Order granting Appellant permission to file the record on appeal outside of the deadlines set by Rule 208 and 240 of the South Carolina Appellate Court Rules. Good cause exists to for the Court to grant Appellant's motion. First, after the time of filing Appellant's initial brief and the deadline for the Record on Appeal, circumstances arose that made it questionable as to whether counsel was going to continue their representation of Appellant. Second, undersigned counsel was suddenly required to travel to the Netherlands for an extended time to tend to unforeseen family matters.

*/s/Jonathan S. Arndt*

Jonathan S. Arndt (SC Bar #: 103128)

81 Columbus St., Suite A

Charleston, SC 29403

P: 843.822.1311

[jonathan@attorneymiller.com](mailto:jonathan@attorneymiller.com)

*Attorneys for the Appellant*

**RECEIVED**

**Nov 19 2025**

**SC Court of Appeals**

**Attorneys for Respondent:**

C. Steven Moskos, P.A.  
6650 Rivers Ave., Suite 210  
North Charleston, SC 29406  
T: 843-763-5297  
steve@moskoslawfirm.com