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Mar 19 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE MASTER-IN-EQUITY FOR THE NINTH JUDICIAL CIRCUIT
Mikell R. Scarborough, Master-In-Equity Judge

Appellate Case No. 2025-002255

Sheila Bailey, Appellant,

v.

Kia Motors America, Inc., Respondent.

Motion for Extension of Time

Appellant respectfully requests a 30-day extension from today's date in which to file her Initial Brief, which is otherwise due today. This is Appellant's second request for an extension of time in this matter. Appellant's counsel is a sole practitioner. In addition to researching the law and writing a brief for this matter, he has to handle all the other matters in his office, including responding to clients, preparing for hearings, and filing complaints and motions.

Prior to filing this motion, counsel contacted opposing counsel who has consented to this motion.

Respectfully submitted,

C. STEVEN MOSKOS, P.A.
ATTORNEY FOR APPELLANT

s/C. Steven Moskos

SC Bar No.: 7938

6650 Rivers Ave., Suite 210

North Charleston, SC 29406

Telephone: (843) 763-5297

steve@moskoslawfirm.com

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Proof of Service

I certify that a copy of Appellant's Second Motion for Extension of Time was served today on Respondent by serving Respondent's Counsel of Record, Curtis L. Ott, by electronic service and by placing a copy in the United States mail, postage pre-paid, addressed to:

Curtis L. Ott
Gallivan, White & Boyd P.A.
PO Box 7368
Columbia, SC 29202
cott@gwblawfirm.com

Charleston, South Carolina
March 19, 2026

C. STEVEN MOSKOS, P.A.
ATTORNEY FOR APPELLANT
s/C. Steven Moskos
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C. STEVEN MOSKOS, P.A.
ATTORNEY AND COUNSELOR AT LAW

C. Steven Moskos
Board Certified Civil Trial Attorney
Board Certified Civil Pretrial Advocate
By the National Board of Trial Advocacy
Supreme Court of South Carolina Certified Mediator



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March 19, 2026

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

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SC Court of Appeals

RE: Sheila Bailey v. Kia Motors America, Inc.
Appellate Case No. 2025-002255

Dear Ms. Kitchings:

Please find enclosed:

1. Appellant's Second Motion to Extend Time;
2. A proof of service on Respondent; and
3. Check numbered 11642 in the amount of \$50.00 as the filing fee.

If you have any questions, please do not hesitate to contact me.

Sincerely,

C. Steven Moskos
CSM/ic

Enclosures

cc: Brooks R. Fudenberg, Esq.
Curtis Ott, Esq.
Sheila Bailey