

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Dorchester County  
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

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Case No. 2009-CP-18-0452

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Rita M. Pugh,

Respondent,

v.

Bi-Lo, LLC,

Appellant.

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**APPELLANT'S SECOND MOTION  
FOR EXTENSION OF TIME TO SERVE/FILE  
INITIAL REPLY BRIEF**

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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Duke R. Highfield (SC Bar No. 64224)  
Brandt R. Horton (SC Bar No. 72572)  
Russell G. Hines (SC Bar No. 72100)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for the Appellant*

**RECEIVED**

DEC 09 2013

SC Court of Appeals

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TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA  
COURT OF APPEALS

COMES NOW the Appellant, Bi-Lo, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves this Honorable Court as follows for an additional extension of fifteen (15) days' time to serve/file any initial reply brief and corresponding designation of matter to be included in the record on appeal.

The Initial Brief of Respondent was served on November 4, 2013. Pursuant to Rule 208(a)(3), SCACR, any initial reply brief on behalf of the Appellant was originally due by November 14, 2013. In response to the Appellant's letter requesting an extension, by Order filed November 19, 2013, the Court granted an extension of this deadline until November 25, 2013. Prior to making the instant (second) motion, the Appellant moved for an extension of this deadline through today, December 5, 2013. To the best of the undersigned's knowledge, that (first) motion has not yet been acted upon by the Court.

On account of work-related and other time commitments (to include those associated with the recent Thanksgiving holiday), the Appellant hereby requests an extension of 15 days' additional time beyond December 5, 2013, i.e., through December 20, 2013, to serve/file any initial reply brief and corresponding designation of matter to be included in the record on

appeal. The Court's allowance of the requested extension will be of considerable benefit to the Appellant's counsel in preparing any initial reply brief/designation of matter and, counsel respectfully submits, the requested extension is founded upon good cause and is in the interests of justice and will work no undue prejudice upon the Respondent. Moreover, prior to making this motion, the undersigned consulted with John S. Nichols, Esquire, counsel for the Respondent, who has kindly authorized the undersigned to represent to the Court that the Respondent does not object to the requested extension of time.

WHEREFORE, with the consent of the Respondent, the Appellant moves for an additional extension of time (of 15 days) through December 20, 2013 to serve/file any initial reply brief and corresponding designation of matter to be included in the record on appeal. Further, the Appellant asks that its present reply-briefing deadline be held in abeyance pending the Court's action on this motion.

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

Duke R. Highfield (SC Bar No. 64224)

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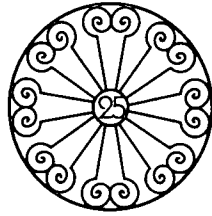
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*Attorneys for the Appellant*

Charleston, South Carolina

Dated: 12/5/13



**YCR LAW**  
Young Clement Rivers, LLP

Jennifer L. McGibbon  
Secretary

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December 5, 2013

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

**RECEIVED**  
DEC 9 9 2013  
SC Court of Appeals

Re: Rita M. Pugh v. Bi-Lo, LLC  
Appellate Case No.: 2012-212860  
Case No.: 2009-CP-18-0452  
Claim No.: 440L29727701  
Date of Loss: 8/31/2008  
YCR File: 5457-20090359

Dear Jenny:

Enclosed please find the original and six (6) copies of the Appellant's Motion for Extension of Time to Serve/File Initial Reply Brief and the original and two (2) copies of the Proof of Service for same. Also included is a firm check to cover the filing fee. I kindly request that you file the original and return the Court-Stamped copy to me in the enclosed self-addressed stamped envelope.

By copy of this letter, I am notifying all counsel of record of this request. Should you have any questions regarding this filing, please feel free to contact our office.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Jennifer L. McGibbon  
Secretary

JLM/jlm

Enclosures

cc: Julio Rossington, Esquire  
John S. Nichols, Esquire