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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lexington County
Court of Common Pleas

Honorable William P. Keesley, Circuit Court Judge

Alan J. Baumann and Kayla D. Baumann,

RESPONDENTS,

V.

Ivan Chernev and Ignatova Petia Chernev,

APPELLANTS.

APPELLATE CASE NO. 2026-000031
CIVIL ACTION NO. 2023-CP-32-03506

RESPONDENTS' MOTION FOR SECOND EXTENSION OF TIME TO FILE INITIAL BRIEF OF RESPONDENTS

Respondents respectfully request a 30-day extension of time to file their initial brief in this matter. This is Respondents' second request for an extension of this deadline. Respondents previously sought and obtained a 30-dy extension. The request is premised on a trial, other deadlines and work obligations that the undersigned has had in other matters.

The Initial Brief of Respondents is due to be served and filed on August 12, 2026. If the Court grants this extension request, the new deadline for Respondents' initial brief will be Friday, September 11, 2026. The undersigned consulted with counsel for Appellants and they consent to this request.

WHEREFORE, Respondents pray that this Court extend the deadline for the service and filing of Respondents' initial brief to September 11, 2026.

Respectfully Submitted,

s/Anna W. Yonge
Anna W. Yonge (SC Bar No. 102407)
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Attorney for Respondents

August 10, 2026

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PROOF OF SERVICE

I certify that I served the Respondents' Motion for Second Extension of Time to File Initial Brief of Respondents on Appellants by depositing a copy of it in the US mail, postage prepaid on August 10, 2026, addressed to their attorney of record, Kathleen McDaniel, Esquire, Burnette Shutt & McDaniel, PA, PO Box PO Box 1929,Columbia, SC 29202, and by emailing a copy to their attorney of record at kmcdaniel@burnetteshutt.law.

s/Anna W. Yonge
Jason T. Yonge (SC Bar No. 102869)
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August 10, 2026

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Robert T. Williams, Sr.
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W. Lisa Brink* (*retired*)

Anna W. Yonge
Jason T. Yonge

August 10, 2026

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Via Hand-Delivery
The Honorable Jenny A. Kitchings
1220 Senate Street
Columbia, SC 29201

RE: Alan J. Baumann v. Ivan Chernev – Appellate Case No. 2026-000031

Dear Ms. Kitchings:

The Initial Brief of Respondents in the above-referenced civil appeal is due to be served and filed on August 12, 2026. However, due to a heavy workload, I am requesting a 30-day extension to serve and file these documents. This is the second extension request regarding the Initial Brief of Respondents, and it is not intended for the purpose of delay.

I appreciate your consideration of this request and ask that the filing deadlines be held in abeyance while this request is pending.

I have also enclosed a check in the amount of $50.00 for the filing fee.

By copy of this letter, I am informing counsel for the Appellants of this extension request.

Sincerely,

s/Anna W. Yonge
Anna W. Yonge, Esq.
Attorney for Respondents
SC Bar Number 102407

AWY
Enclosure – check
cc: Kathleen McDaniel, Esq. (*via mail and e-mail*)
Alan and Kayla Baumann (*via e-mail*)