

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No.: 2014-CP-26-07862  
Appellate No.: 2016-000522

**RECEIVED**

OCT 25 2016

**SC Court of Appeals**

Karon Mitchell and Kyle Mitchell,..... Appellants,

vs.

Rabon & Rabon, Inc. ....Respondent.

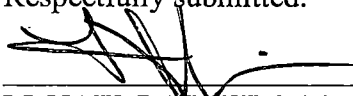
RESPONDENT'S MOTION FOR EXTENSION TO FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER

The Respondent, Rabon & Rabon, Inc. ("Respondent"), hereby moves before this Honorable Court for an extension of time, pursuant to Rule 240, SCACR, within which to prepare Respondent's Initial Brief and Designation of Matter. Respondent's Initial Brief and Designation of Matter is due on October 24, 2016. As a result of flooding, office closure, and court closure associated with Hurricane Matthew, as well as other exigencies, Respondent respectfully requests a 30-day extension of this deadline.

The Respondent has not previously requested, nor been granted, an extension for any purpose throughout this appeal process.

WHEREFORE, having fully set before this Court the grounds for this motion, the Respondent moves for an Order granting an extension of time for the filing of their Initial Brief and Designation of Matter until November 23, 2016.

Respectfully submitted.

A handwritten signature in black ink, appearing to be "Henrietta U. Golding", written over a horizontal line.

**McNAIR LAW FIRM, P.A.**  
Henrietta U. Golding, SC Bar #2173  
Lane D. Jefferies, SC Bar #101764  
Post Office Box 336  
2411 Oak Street, Suite 206  
Myrtle Beach, SC 29578  
(843) 444-1107

Myrtle Beach, South Carolina  
October 24, 2016

Attorneys for Respondent  
Rabon & Rabon, Inc.

**MCNAIR**  
ATTORNEYS

Lane D. Jefferies

ljefferies@mcnair.net  
T (843) 443-3059  
F (843) 444-3964

October 24, 2016

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

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SC Court of Appeals

RE: *Karon Mitchell v. Rabon & Rabon, Inc.*  
Appellate Case No.: 2016-000522  
Our File No.: 062992.00001

Dear Ms. Kitchings:

With regard to the above matter, enclosed please find a copy of the following:

- Original (unbound) and seven copies of Respondents Rabon & Rabon, Inc.'s Motion for Extension to File their Initial Brief and Designation of Matter; and
- Proof of Service.

By copy of this letter to parties of record, and as shown on the Proof of Service, I hereby serve a copy of the aforementioned documents to the parties of record.

Please return to me one clocked copy of the enclosed documents in the enclosed self-addressed envelope.

Best regards,

**McNair Law Firm, P.A.**



Lane D. Jefferies

McNair Law Firm, P. A.  
Founders Centre  
2411 Oak Street, Suite 206  
Myrtle Beach, SC 29577

Mailing Address  
Post Office Box 336  
Myrtle Beach, SC 29578

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LDJ:dmb

Enclosures

cc: Tucker S. Player, Esq. (via email - [tucker@playerlawfirm.com](mailto:tucker@playerlawfirm.com))  
Clients

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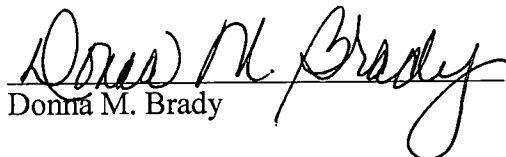
Rabon & Rabon, Inc. ....Respondent.

PROOF OF SERVICE

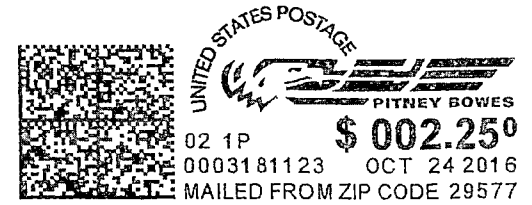
I, Donna M. Brady, an employee of McNair Law Firm, P.A., certify that I have served Respondent's Motion for Extension to File Initial Brief and Designation of Matter, and Proof of Service on all parties to this matter by depositing a copy in the United States Mail, first class postage prepaid on the 24th day of October, 2016.

Counsel for Appellant of Record:

Tucker S. Player, SC Bar # 16217  
Player Law Firm  
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Columbia, SC 29210

  
Donna M. Brady

Myrtle Beach, South Carolina



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