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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas  
D. Garrison Hill, Circuit Court Judge

**RECEIVED**

OCT 31 2016

SC Court of Appeals

Case No. 2013-CP-42-03915  
Appellate Case No. 2016-000227

Angie Keene, Individually and as Personal  
Representative of the Estate of Dennis Seay, Deceased,  
and Linda Seay, ..... Respondents,

v.

CNA Holdings, LLC, ..... Appellant.

APPELLANT'S MOTION FOR EXTENSION TO FILE  
INITIAL BRIEF & DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL

Pursuant to Rules 208(a)(3) and 240 of the South Carolina Appellate Court Rules, Appellant CNA Holdings, LLC requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter in the above-captioned matter. This is the second request for an extension of this deadline.


Appellant's counsel requests this extension due to recent travel on business which has kept him out of the office most of last week and current travel on business scheduled for all of next week. At this time, Appellant does not expect to use the full thirty (30) day extension amount.

Currently, Appellant's Initial Brief and Designation are due on November 9, 2016. With the additional thirty (30) day extension, Appellant's Initial Brief and

✓

Designation will be due on Friday, December 9, 2016. Appellant asks that the current deadline be held in abeyance pending the Court's consideration and resolution of this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:  \_\_\_\_\_

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Attorneys for CNA Holdings, LLC

Columbia, South Carolina

10/31, 2016

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Court of Common Pleas  
D. Garrison Hill, Circuit Court Judge

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Angie Keene, Individually and as Personal  
Representative of the Estate of Dennis Seay, Deceased,  
and Linda Seay,.....

Respondents,

v.

CNA Holdings, LLC, .....

Appellant.

**PROOF OF SERVICE**

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for CNA Holdings, LLC, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Appellant's Motion for Extension to File Initial Brief &  
Designation of Matter to be Included in the Record on  
Appeal

Counsel Served:

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Blake A. Hewitt, Esquire  
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*Lisa P. Whitehurst*

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Lisa P. Whitehurst  
Administrative Assistant

October 31, 2016

# Nelson Mullins

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October 31, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
OCT 31 2016  
SC Court of Appeals

RE: Angie Keene, as Personal Representative of the Estate of Dennis Seay and  
Linda Seay, Individually v. 3M Company, et al.  
Civil Action No. 2013-CP-42-03915  
Our File No. 46697/01501

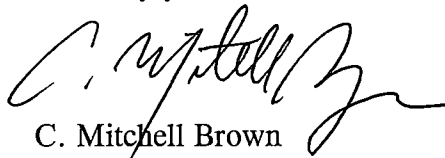
Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Appellant's Motion for Extension to File Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us via our courier. Also enclosed is our check in the amount of \$25.00 as the required filing fee.

By copy of this letter to counsel of record, we are serving them with a copy of this motion.

With kind regards, I remain

Sincerely yours,



C. Mitchell Brown

CMB:lpw  
Enclosures

cc: Theile B. McVey, Esquire  
John S. Nichols, Esquire  
Blake A. Hewitt, Esquire