

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

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

RECEIVED
DEC 28 2016
SC Court of Appeals

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

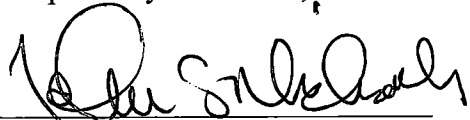
v.

CNA Holdings, LLC, Appellant.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, respondents request a 30-day extension of the
deadline for filing their initial brief and designation of matter to be included in the record on
appeal. The current deadline is January 9, 2017. This is the first request for an extension of
this deadline.

Respectfully Submitted,



John S. Nichols, SC Bar # 4210
Blake A. Hewitt, SC Bar #73674
BLUESTEIN NICHOLS
THOMPSON & DELGADO
Post Office Box 7965
Columbia, South Carolina 29202
(803) 779-7599

December 28, 2016

Attorneys for Respondents

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v.

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Appellant with a copy of the *Motion for Extension* by mailing copies of
the same by United States Mail with first class postage prepaid to the following address:

C. Mitchell Brown
A. Mattison Bogan
Michael J. Anzelmo
Blake T. Williams
Nelson Mullins Riley & Scarborough, LLP
PO Box 11070
Columbia, SC 29211

December 28, 2016



Erin Bridges
BLUESTEIN, NICHOLS,
& DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

December 28, 2016

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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RE: Angie Keene v. CNA Holdings
Case Tracking No.: 2016-000227

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to this case. I have also enclosed a proof of service of this document upon counsel for Appellant and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Theile B. McVey, Esquire
C. Mitchell Brown, Esquire
A. Mattison Bogan, Esquire
Michael J. Anzelmo, Esquire
Blake T. Williams, Esquire