

82356

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
JAN 31 2017
SC 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

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 February 8, 2017. This is the second 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

January 31, 2017

Attorneys for Respondents

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
JAN 31 2017
SC 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

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

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

January 31, 2017



Erin Bridges
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

RECEIVED
JAN 31 2017
SC Court of Appeals

January 31, 2017

VIA HAND DELIVERY

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

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