

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2016-001842
Case No. 2013-CP-10-3901

Charleston Electrical Services, Inc. and Selective Insurance
Company of South Carolina as Subrogee of
Charleston Electrical Services, Inc., Appellants,

v.

Wanda G. Rahall..... Respondent.

APPELLANTS' MOTION FOR EXTENSION
TO FILE INITIAL REPLY BRIEF

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The Appellants respectfully move this Court for a twenty day extension of time until July 10, 2017, by which to file and serve their Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellants' motion is based on the following grounds:



1. The Initial Reply Brief is currently due to be filed and served on June 19, 2017.

2. The Court issued its Order denying the Respondent's Motion to Strike on June 7, 2017. While the Court issued a letter dated June 7, 2017, stating that the Record on Appeal is now due by July 7, 2017, the Appellants have not as yet been given the opportunity to file an Initial Reply Brief. The Appellants' time limits for filing an Initial Reply Brief should have been held in abeyance during the pendency of the Respondent's Motion to Strike. Historically, the Court has treated such motions as holding briefing deadlines in abeyance and rightly so because the parties need to know the results of any motion to strike materials from the Record on Appeal before being able to complete the briefing process.

3. This is the first request for an extension for the Initial Reply Brief since the Respondent's Motion to Strike has been resolved by the Court.

WHEREFORE, the Appellants respectfully request that they be allowed until July 10, 2017, by which to file and serve their Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY:  _____

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Counsel for Appellants

June 19, 2017

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Wanda G. Rahall..... Respondent.

CERTIFICATE OF SERVICE

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The undersigned employee of Davidson & Lindemann, P.A., counsel for the Appellants, does hereby certify that service of **Appellants' Motion for Extension to File Initial Reply Brief** in the above-captioned matter was made upon all counsel of record by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 19th day of June 2017:

Edward K. Pritchard, III, Esquire
Elizabeth F. Fulton, Esquire
Pritchard Law Group, LLC
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June 19, 2017

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The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Charleston Electrical Services, Inc. and Selective Insurance Company of South Carolina
as Subrogee of Charleston Electrical Services, Inc. v. Wanda G. Rayhall
Appellate Case Number: 2016-001842
Civil Action Number: 2013-CP-10-3901
Claim Number: 21010307
Our File Number: 307.9065

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of **Appellants' Motion for Extension to File Initial Reply Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

cc: Elizabeth F. Fulton, Esquire (w/ Enclosure)

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JUN 22 2017

SC Court of Appeals



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