

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2016-002487

Cassandra M. Myers and Bartholomew Myers
in their capacity as Co-Personal Representatives
of the Estate of Evan Morris Myers,Appellants,

v.

The Consolidated Employee Recreation Clubs, a
non-profit organization a/k/a Pine Island Club
at Lake Murray, South Carolina Electric and Gas
Holding Company, Inc.; SCANARespondents.

**RESPONDENTS' FIRST MOTION
FOR EXTENSION OF TIME TO FILE
RESPONDENTS' INITIAL BRIEF
AND DESIGNATION OF MATTER**

RECEIVED
AUG 14 2017
SC Court of Appeals

TO: THE HONORABLE JUDGES OF THE COURT OF APPEALS OF SOUTH
CAROLINA:

Pursuant to Rule 263(b), SCACR, Respondents The Consolidated
Employee Recreation Clubs, a non-profit organization a/k/a Pine Island Club



at Lake Murray, South Carolina Electric and Gas Holding Company, Inc., and SCANA (“Respondents”) respectfully move this Court for a thirty day extension of time to file Respondents’ Initial Brief and Designation of Matter.

Counsel for Respondents have been conscientious in their efforts to prepare Respondents’ Initial Brief and Designation of Matter; however, because of the complexity of many of the legal issues attendant in this case, counsel projects they will require additional time to complete their Initial Brief and Designation of Matter. The current deadline is August 14, 2017. Respondents request a thirty (30) day extension, which would place the new deadline at September 13, 2017.

This is counsel’s first motion for an extension of time to file Respondents’ Initial Brief and Designation of Matter. Respondents greatly appreciate the Court’s time, attention, and assistance with regard to this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.



CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com

KELSEY J. BRUDVIG
kbrudvig@collinsandlacy.com

COLLINS & LACY, P.C.
Post Office Box 12487
Columbia, South Carolina 29211
(803) 256-2660 (voice)
(803) 771-4484 (facsimile)

ATTORNEYS FOR RESPONDENTS

**RESPONDENTS' FIRST MOTION
FOR EXTENSION OF TIME TO
FILE RESPONDENTS' INITIAL
BRIEF AND DESIGNATION OF
MATTER**

Columbia, South Carolina
August 14, 2017

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at Lake Murray, South Carolina Electric and Gas
Holding Company, Inc.; SCANA Respondents.

PROOF OF SERVICE

I hereby certify that I served Respondents' First Motion for Extension of Time to File Respondents' Initial Brief and Designation of Matter upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on August 14, 2017, addressed to the following:

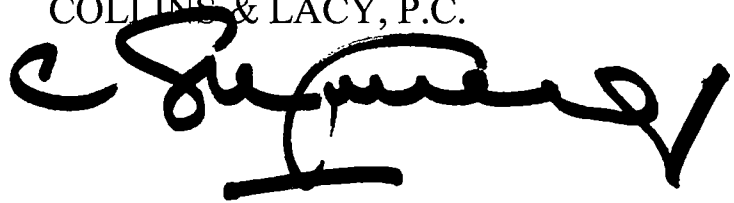
COUNSEL SERVED:

Pedro E. Krompecher, III, Esquire
Krompecher Law Firm, PLLC
Post Office Box 6639
Raleigh, NC 27628
Counsel for Appellants

Edward L. Graham, Esquire
Graham Law Firm, P.A.
Post Office Box 550
Florence, SC 29501
Counsel for Appellants

Respectfully submitted,

COLLINS & LACY, P.C.



CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com
KELSEY J. BRUDVIG
kbrudvig@collinsandlacy.com
COLLINS & LACY, P.C.
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ATTORNEYS FOR RESPONDENTS

**PROOF OF SERVICE-
RESPONDENTS' FIRST MOTION
FOR EXTENSION OF TIME TO
FILE RESPONDENTS' INITIAL
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MATTER**



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

August 14, 2017

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SC Court of Appeals

VIA HAND DELIVERY

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

Re: *Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal Representatives of the Estate of Evan Morris Myers, vs. The Consolidated Employee Recreation Clubs, a non-profit organization a/k/a Pine Island Club at Lake Murray, South Carolina Electric and Gas Holding Company, Inc./SCANA*

Civil Action No. 2014-CP-32-02210
Appellate File No. 2016-002487
Claim No. 683-411339
C&L File No. 000001-02078

Dear Ms. Kitchings:

Please find enclosed for filing the unbound original and seven (7) copies of Respondents' Motion for Extension of Time to file their Initial Brief and Designation of Matter in the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the filing fee of same. Please file the original and return a clocked copy of same via our courier.

By copy of this letter and enclosure, we are serving same on counsel of record.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,

Christian Stegmaier

CS/mmm
Enclosures

cc: Edward L. Graham, Esquire
Pedro E. Krompecher, III, Esquire



1330 Lady Street, Sixth Floor (29201) Post Office Box 12487 | Columbia, SC 29211

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
1-2078

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