

84916

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED  
OCT 23 2017  
SC 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.; SCANA, Respondents.

**MOTION FOR EXTENSION**

COMES NOW, the Appellant, Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal Representatives of the Estate of Evan Morris Myers, by and through their undersigned counsel, and hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 10 days to file the Reply Brief in this action, or until November 2, 2017. The current deadline for the Reply is October 23, 2017. Appellant respectfully submits this request is needed to address arguments submitted by Respondents in their Initial Brief not wholly identical to those previously argued and to allow time to print all necessary copies of the Reply. During the same period, Petitioner's attorney departed on Tues October 17<sup>th</sup> for out of town depositions, witness

✓

preparation, and new client visits. Petitioner's attorney will not return until Tuesday, October 24<sup>th</sup>, one day after the due date.

Accordingly, Petitioner respectfully requests until **November 2, 2017** in which to file the Reply Brief in this action.

By: 

Edward L. Graham (SC Bar: 2483)  
GRAHAM LAW FIRM, P.A.  
Post Office Box 550  
Florence, SC 29503  
t. (843) 662-3281  
f. (800) 859-7028

Pedro E. Krompecher, III (SC Bar:  
100485)  
P.O. Box 6639  
Raleigh, North Carolina 27628  
Telephone: (919) 977-8082  
Facsimile: (919) 746-7588  
Email: [pedro@krompecherlaw.com](mailto:pedro@krompecherlaw.com)

Attorneys for Petitioner

October 20, 2017

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

---

RECEIVED

OCT 23 2017

SC Court of Appeals

---

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.; SCANA,

Respondents.


---

**PROOF OF SERVICE**

---

The undersigned, an attorney in this matter for the Petitioner, certifies that I have this 20<sup>th</sup>  
day of October 2017 served copies of the Motion for Extension upon counsel for the Respondents  
by depositing them in the United States mail, first-class postage prepaid, addressed to:

Christian Stegmaier  
Megan H. Hall  
Collins & Lacy, P.C.  
1330 Lady Street  
Sixth Floor  
Columbia, SC 29201

By:   
Edward L. Graham  
Diane M. Rodriguez  
GRAHAM LAW FIRM, P.A.  
Post Office Box 550  
Florence, SC 29503  
t. (843) 662-3281  
f. (800) 859-7028

Attorneys for Petitioner



# GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham  
Diane M. Rodriguez

RECEIVED

OCT 23 2017

SC Court of Appeals

October 20, 2017

The Honorable Jenny Abbott Kitchings  
Clerk, 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, 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.; SCANA, Respondents.*  
Appellate Case No. 2016-002487

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Appellant's Motion for Extension of Time to File the Reply Brief, along with a certificate of mailing. Please file the original and copies and return a clocked stamped copy to us in the envelope provided for your convenience. Also, enclosed is our law firm's check in the amount of \$25.00 for the filing fee.

Thank you for your attention to this matter.

Very truly yours,

Edward L. Graham

ELG/ eb

Enclosures

cc: Christian Stegmaier  
Megan H. Hall

GRAHAM LAW FIRM, P.A.  
383 West Cheves Street, Florence, SC 29501

MAIN OFFICE  
P.O. Box 550, Florence, SC 29503  
Phone 843.662.3281

SATELLITE OFFICE  
P.O. Box 604, Sumter, SC 29151  
Phone 803.774.4444

EFax 1.800.859.7028  
EGraham@GrahamLawFirm.net

DianeR@GrahamLawFirm.net



1000



29201

U.S. POSTAGE  
PAID  
SUMTER, SC  
29150  
OCT 20, 17  
AMOUNT

**\$1.82**  
R2304H107852-05



# GRAHAM LAW

GRAHAM LAW FIRM, P.A.  
383 West Cheves Street  
P.O. Box 550 (29503)  
Florence, SC 29501

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