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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity

**RECEIVED**  
FEB 21 2018  
SC Court of Appeals

Case No. 2016-001440

Carolina Chloride, Inc., .....Appellant,

v.

South Carolina Department of Transportation, .....Respondent.

**FIRST MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANT’S PETITION FOR REHEARING**

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

Pursuant to Rules 240 and 263(b), of the South Carolina Appellate  
Court Rules, counsel for Appellant Carolina Chloride, Inc., LLC, respectfully  
moves the Court for an extension of time to file Appellant’s Petition for  
Rehearing. The Petition for Rehearing is due on February 22, 2018. Counsel

respectfully requests a fifteen (15) day extension of time. Accordingly, the Petition for Rehearing would be due on March 9, 2018.

Counsel asserts the extension is necessary due to counsel has been out of state for the past week handling a wrongful death case in Broward County, Florida. This is counsel's first motion for an extension of time to file the Petition for Rehearing.

Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By:   
CHRISTIAN STEGMAIER  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
KELSEY J. BRUDVIG  
[kbrudvig@collinsandlacy.com](mailto:kbrudvig@collinsandlacy.com)  
1330 Lady Street, Sixth Floor (29201)  
Post Office Box 12487  
Columbia, South Carolina 29211  
(803) 256-2660 (voice)  
(803) 771-4484 (facsimile)

And:

SULLIVAN LAW FIRM, PC

EDWARD D. SULLIVAN  
[esullivan@esullivanlaw.com](mailto:esullivan@esullivanlaw.com)  
Post Office Box 11714  
Columbia, South Carolina 29211  
(803) 451-2775 (Voice)  
(803) 451-2770 (Facsimile)

ATTORNEYS FOR APPELLANT

FIRST MOTION FOR EXTENSION OF  
TIME TO FILE APPELLANT'S  
PETITION FOR REHEARING

Columbia, South Carolina  
February 21, 2018

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Carolina Chloride, Inc., .....Appellant,

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\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I hereby certify that I served Appellant's First Motion for Extension of Time to File Appellant's Petition for Rehearing upon all parties, by placing a copy in the United States mail, postage prepaid, to the below listed parties on February 21, 2018, addressed to the following:

Beacham O. Brooker, Jr., Esquire  
754 Kilbourne Road  
Columbia, SC 29205

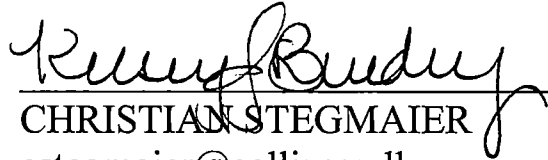
*Counsel for Respondent*

Edward D. Sullivan  
SULLIVAN LAW FIRM, PC  
Post Office Box 11714  
Columbia, South Carolina 29211  
*Co-counsel for Appellant*

Respectfully submitted,

COLLINS & LACY, P.C.

By:



CHRISTIAN STEGMAIER  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)

KELSEY J. BRUDVIG  
[kbrudvig@collinsandlacy.com](mailto:kbrudvig@collinsandlacy.com)

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(803) 256-2660 (voice)

(803) 771-4484 (facsimile)

And:

SULLIVAN LAW FIRM, PC

EDWARD D. SULLIVAN  
[esullivan@esullivanlaw.com](mailto:esullivan@esullivanlaw.com)

Post Office Box 11714

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ATTORNEYS FOR APPELLANT

PROOF OF SERVICE – FIRST  
MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANT’S PETITION  
FOR REHEARING

Columbia, South Carolina  
February 21, 2018



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

February 21, 2018

**VIA HAND DELIVERY**

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

**RECEIVED**

FEB 21 2018

SC Court of Appeals

**Re: Carolina Chloride, Inc. v. South Carolina Department of Transportation**  
**Civil Action No. 2016-001440**  
**C&L File No. 001114-00102**

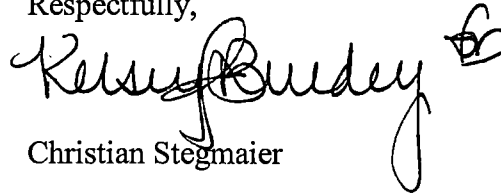
Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Appellant's Motion for Extension of Time to File Appellant's Petition for Rehearing 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 with our courier.

By copy of this letter and enclosure, we are serving same upon counsel for Respondent.

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

Respectfully,



Christian Stegmaier

CS/mmm

Enclosures

cc: Beacham O. Brooker, Jr., Esquire  
Edward D Sullivan  
Ryan Morgan





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

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FEB 21 2018  
SC Court of Appeals

**VIA HAND DELIVERY**

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

1114-102