

908912

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2019-001032

Caleb Snow and Mary Snow, as P.R. of the Estate of Chequita Snow
Burgess, deceasedPlaintiffs,

v.

James Burgess, Michael Scott and Heike Scott,Defendants,

Michael Scott and Heike Scott, Third-Party
Plaintiffs, Appellants,

v.

Eugene Rhinehart, Third-Party
Defendant, Respondent.

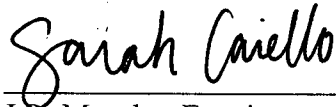
RECEIVED

**RESPONDENT EUGENE RHINEHART'S MOTION FOR EXTENSION OF
TIME**

SEP 18 2019
SC Court of Appeals

Respondent, Eugene Rhinehart, by and through his undersigned attorneys, hereby respectfully moves for an extension of time of thirty (30) days from the original due date, up to and including October 23, 2019, to file and serve his Initial Brief and Designation of Matter. The grounds for this motion is that counsel for Respondent Eugene Rhinehart was out of the country from September 1, 2019 to September 8, 2019 on a trip to Mexico with her family and was then summoned to serve, and is currently serving, jury duty in the Richland County Magistrate Court from September 16, 2019 until September 19,

2019 and therefore will need additional time to complete and file the brief in this matter. Counsel has consulted with the attorney for the Appellants Michael and Heike Scott, who has consented to this Motion.



J.R. Murphy, Esquire
Sarah E. Caiello, Esquire
Murphy & Grantland, P.A.
P.O. Box 6648
Columbia, SC 29260
(803) 782-4100
Attorneys for Eugene Rhinehart

September 18, 2019

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

No. 2019-001032

Michael Scott and Heike Scott v. Eugene Rhinehart

APPEARANCE OF COUNSEL FORM

THE CLERK WILL ENTER MY APPEARANCE AS COUNSEL ON BEHALF OF:

Eugene Rhinehart, Third Party Defendant, Respondent

(Enter Party Name and Party Type -- Appellant, Appellee, etc.)

Sarah Caiello
(Signature)

Counsel not yet admitted to practice before the Fourth Circuit must complete and return an application for admission with this form.

(Q) Sarah Caiello, Esquire (SCB 103864)
Murphy & Grantland, PA
4406 B Forest Drive
P.O. Box 6648
Columbia, SC 29260

Area Code & Phone No.: 803-782-4100
Area Code & FAX No.: 803-782-4140
Email Address: Scaiello@murphygrantland.com

RECEIVED
SEP 18 2019
SC Court of Appeals

I am not participating in this case. Appellate counsel is:

(Name)

(Phone)

I have previously registered for e-mail or fax service via FENS.

I consent to electronic service, in lieu of service by U.S. Mail, of orders, opinions, correspondence, and other documents issued by the Court. I understand that this consent applies, unless withdrawn, to all Fourth Circuit cases in which I am counsel.

In indicating your preferred address for service by e-mail, please provide a shared e-mail address (one that will be checked when you are out of the office). Please indicate your preference below and sign.

I prefer e-mail at _____ or

I prefer fax at _____

I do not consent to electronic service.

(Signature)

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2019-001032

Caleb Snow and Mary Snow, as P.R. of the Estate of Chequita Snow
Burgess, deceasedPlaintiffs,

v.

James Burgess, Michael Scott and Heike Scott,Defendants,

Michael Scott and Heike Scott, Third-Party
Plaintiffs, Appellants,

v.

Eugene Rhinehart, Third-Party
Defendant Respondent.

RECEIVED

SEP 18 2019

SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on all parties by depositing a copy of it in the United States Mail, postage prepaid, on September 18, 2019, addressed to the attorneys of record, Damon C. Wlodarczyk, Esquire, Riley Pope & Laney, LLC, P.O. Box 11412, Columbia, SC 29211.

Sarah Caiello

J.R. Murphy, Esquire
Sarah E. Caiello, Esquire
Murphy & Grantland, P.A.
P.O. Box 6648
Columbia, SC 29260
(803) 782-4100
Attorneys for Eugene Rhinehart

September 18, 2019



MURPHY & GRANTLAND, P.A.

Sarah E. Caiello
Direct dial 803-454-1257
scaiello@murphygrantland.com

September 18, 2019

HAND DELIVERED

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

Re: Caleb Snow and Mary Snow as P.R. of The Estate of Chequita Burgess, deceased v. James Burgess v. Michael Scott and Heike Scott v. Eugene Rhinehart
Civil Action No.: 2018-CP-38-00766
Appellate Case No.: 2019-001032
Claim No.: 5000735124-1-2
Insured: Eugene Rhinehart
Date of Loss: 05-26-16
Our File No.: 1333-0309

Dear Ms. Kitchings:

Enclosed please find herewith for filing with the Court the original and one copy of the Respondent's Motion for Extension of Time in the above-referenced matter. Also enclosed is my firm's check in the amount of \$50.00 for filing same. I would appreciate your filing the original and returning a clocked copy to me by individual delivering same.

By copy of this letter I am serving same on opposing counsel.

With warm personal regards, I am

Sincerely yours,

Sarah E. Caiello

SEC/hws
Enclosures
cc: Counsel of Record

RECEIVED
SEP 18 2019
SC Court of Appeals

HAND DELIVERY



Sarah E. Caiello, Esquire
Murphy & Grantland, P.A.
Post Office Box 6648
Columbia, South Carolina 29260

RETURN SERVICE REQUESTED

TO:

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