

67251

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Deadra L. Jefferson, Circuit Court Judge

Case No. 2010-CP-10-9917

Rolando Santiago, as the Personal Representative of the  
Estate of Jose Hernandez-Arizmendi a/k/a Eduardo Gomez-Ortiz, ... Appellant,

vs.

Chloe Engel, U.S. Group, Inc., Southern Concrete and Construction,  
Inc., Sanders Brothers Construction Company, Inc., J. Moore Electrical  
Contractors, Inc., and Charleston County, ..... Defendants

of whom  
Chloe Engel is ..... Respondent.

**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, Appellant requests a thirty-day extension of the  
deadline for filing and serving the Initial Brief and Designation of Matter to be Included  
in the Record on Appeal in this case. The current deadline is February 14, 2013. This is  
the second request for an extension of this deadline.

/Signature page attached

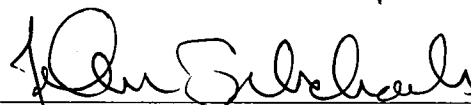
50 COURT OF APPEALS

FEB 14 2013

CLERK OF COURT

February 14, 2013

Respectfully submitted,



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Attorneys for Appellant

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Rolando Santiago, as the Personal Representative of the  
Estate of Jose Hernandez-Arizmendi a/k/a Eduardo Gomez-Ortiz, . . . . Appellant

vs.


Chloe Engel, U.S. Group, Inc., Southern Concrete and Construction,  
Inc., Sanders Brothers Construction Company, Inc., J. Moore Electrical  
Contractors, Inc., and Charleston County, . . . . Defendants

of whom  
Chloe Engel is . . . . Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served  
counsel for the Respondent with a copy of the *Motion for Extension* by mailing copies of  
the same by United States Mail with first class postage prepaid to the following address:

Andrew S. Halio, Esquire  
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Erin Bridges  
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BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC

February 14, 2013  
Columbia, South Carolina



Margaret Miles Bluestein  
John Shannon Nichols  
Stacy Elizabeth Thompson  
John Dennis Delgado  
Allison Paige Sullivan  
Ashley Trout Thompson  
Blake Alexander Hewitt

OF COUNSEL  
O. Eugene Powell, Jr.  
Rebecca Cagle Patrick

February 14, 2013

**VIA HAND DELIVERY**

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

RE: Rolando Santiago, as the Personal Representative of the Estate of Jose Hernandez-Arizmendi a/k/a Esuardo Gomez-Ortiz v. Chloe Engel, et. al.  
Case Tracking No.: 2012-212708

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in regards to this case. I have also enclosed a proof of service of this document on counsel for the Respondent and a \$25.00 check for filing this motion. Please return the additional filed copy to me via the our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,  
*Erin Bridges*

Erin Bridges  
Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS, THOMPSON &  
DELGADO, LLC

/emb

Enclosures

cc: Robert V. Phillips, Esquire  
Daniel W. Luginbill, Esquire  
Andrew S. Halio, Esquire

FILED IN APPEALS

FEB 14 2013

CLERK OF COURT