

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

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Jun 02 2020

SC Court of Appeals

Mary Kimbrell.....Appellant,

v.

Walmart Stores, Inc., Claims Management, Inc., and Josh
Johnson.....Respondents.

Civil Case No.: 2019-CP-23-06795
Appellate Case No. 2020-000668

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

The appellant respectfully requests that the Appellate Court grant an extension of time for the appellant to file the initial brief. The appellant has partially drafted the initial brief, but due to an increasing volume of other appellate cases, including two in the Supreme Court of South Carolina, depositions, mediations, and scheduling conflicts regarding the pandemic, as some offices and courts are beginning to re-open, more time is needed. The appellant has discussed filing this motion with the respondents and they give their consent to the extension to the extent required. The appellant therefore respectfully requests a thirty-day extension of time to file his initial brief so that the initial brief is due July 11, 2020.

June 2, 2020

s/ Joshua T. Hawkins
Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
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Attorneys for Appellants

Ms. Randi Lynn Roberts, Esq.
GaffneyLewis, LLC
3700 Forest Drive, Suite 400
Columbia, South Carolina 29204
T.: (803) 790-8838
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Attorney for Respondents

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PROOF OF SERVICE

I certify that I served a Motion for an Extension of Time to file the Appellant's Initial Brief on Walmart Stores, Inc., Claims Management, Inc., and Josh Johnson, by facsimile, and by depositing copies of it in the United States Mail, postage prepaid, on June 2, 2020, addressed to its attorney of record, Randi Lynn Roberts of GaffneyLewis, LLC, at 3700 Forest Drive, Suite 400, Columbia, South Carolina, 29204, and to (803) 790-8841, and to the Clerk of the South Carolina Court of Appeals, at 1200 Senate Street, Columbia, South Carolina 29201, and to (803) 734-1839.

June 2, 2020

s/Joshua T. Hawkins
Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
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monica@hjllesc.com

June 2, 2020

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SC Court of Appeals

-via U.S. Mail and facsimile: 803-734-1839-
Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *Mary Kimbrell v. Walmart Stores, Inc., Claims Management, Inc., and Josh Johnson*
Appellate Case No. 2020-000668

Dear Ms. Kitchings:

Please find enclosed for filing a motion for an extension of time in the case referenced above. Also please find enclosed the following:

- ✓ proof of service of the motion on the respondents; and
- ✓ the filing fee of \$50.00.

Should you have any questions, please do not hesitate to contact our office.

Sincerely,



Monica Brody
Paralegal

Enclosures

Copies:

(via facsimile and U.S. Mail)
Ms. Randi Lynn Roberts
GaffneyLewis, LLC
3700 Forest Drive, Suite 400
Columbia, South Carolina 29204
T: (803) 790-8838
F: (803) 790-8841
Attorney for Respondents

(via U.S. Mail only)
South Carolina Office of Court Administration
1220 Senate Street
Columbia, South Carolina 29201-3739

FAX COVER SHEET

TO	
COMPANY	
FAX NUMBER	18037341839
FROM	Josh Hawkins
DATE	2020-06-02 20:51:15 GMT
RE	Appellate Case No.: 2020-000668; Mary Kimbrell v. Walmart Stores, Inc., Claims Management, Inc., and Josh Johnson--FILING

COVER MESSAGE

Good afternoon,

Please find attached cover letter, motion for filing, and proof of service, in the above-referenced case, sent also via U.S. Mail this date, June 2, 2020.

Sincerely,

Monica Brody
Paralegal
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
Telephone: (864) 275-8142
Facsimile: (864) 752-0911

If you need immediate assistance and cannot reach anyone at the number above, please call 864-430-3453; we are currently working remotely most days, and have limited access to the office line. Thank you.

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