

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

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Honorable Bentley Price

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CASE NO. 2020-000551

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**RECEIVED**

**Oct 12 2020**

**SC Court of Appeals**

**Craig Chappell, on behalf of himself and others similarly situated, Appellant,**

**v.**

**Ladles Soups - James Island LLC; Ladlessoups, LLC; Ladles Soups at Cane Bay LLC; Ladles Soups at Citadel Mall LLP; Ladles Soups Calhoun LLC; Ladles Soups Cane Bay LLC; Ladles Soups Coosaw LLC; Ladles Soups Downtown Charleston, LLC; Ladlessoups Fresh Fields, LLC; Ladles Soups @ Freshfields Village, LLC; Ladlessoups Mainstreet, LLC; Ladles Soups Moncks Corner LLC; Ladlessoups Mount Pleasant, LLC; Ladles Franchise Development, LLC; Ladles Franchising Inc; Ladles Fort Mill, LLC; Ladles Knightsville LLC; Ladles West Ashley; Teri Owens; Sue Allen; Tray Allen; Steve Traeger; Erik Dyke; Julie Dyke; Stan Sutton; Carol Sutton; Jason Dalter; Kellie Henderson; Jane Doe 1-25 (Unknown Operating Company and Management Company Owners); John Doe 25-40 (Management Personnel), Defendants,**

**Of Which Ladles Soups Coosaw LLC, Ladles Soups Downtown Charleston, LLC, Traeger Unlimited d/b/a Ladlessoups Fresh Fields, LLC, Ladles Soups @ Freshfields Village, LLC, Ladles Soups Moncks Corner LLC, Ladles Franchise Development, LLC, Ladles Fort Mill, LLC, Ladles Knightsville LLC, Ladles West Ashley, Steve Traeger, Stan Sutton, Carol Sutton, and Kellie Henderson are the Respondents.**

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**MOTION TO EXTEND TIME**

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Respondents, Ladles Soups Downtown Charleston, LLC; Ladlessoups Fresh Fields, LLC; Ladles Soups @ Freshfields Village, LLC; Ladles Fort Mill, LLC; Ladles West Ashley; Steve Traeger; Stan Sutton; and Carol Sutton; respectfully requests that the Court grant Respondents an additional thirty (30) days in which to file their initial reply brief. Respondents

respectfully submits that an extension of time is appropriate due to the coronavirus (COVID-19) emergency. Our office staff were affected by exposure and had to quarantine.

The original deadline to file Respondents' reply brief is October 14, 2020 and Attorney for Respondents respectfully request a 30 day extension to file the initial reply brief of Respondent until November 13, 2020.

October 12, 2020

/s Paul B. Ferrara, III  
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Ladles Soups Downtown  
Charleston, LLC; Ladlessoups  
Fresh Fields, LLC; Ladles Soups  
@ Freshfields Village, LLC;  
Ladles Fort Mill, LLC; Ladles  
West Ashley; Steve Traeger; Stan  
Sutton; and Carol Sutton

Other Counsel of Record:

Mr. Benjamin Scott Whaley Le Clercq, Esquire  
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**PROOF OF SERVICE**

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I certify that I have served a copy of the motion to extend time to file the initial reply brief of respondents by depositing a copy of it in the United States Mail, postage prepaid, on October 12, 2020, addressed to:

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October 12, 2020

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Sutton; and Carol Sutton