

CANTRELL LEGAL, PC
PO BOX 1276
GOOSE CREEK SC 29445-1276
843-797-2454 (voice) 309-213-0922 (fax)
Email: lawyer@comcast.net

October 16, 2020

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

RECEIVED
Oct 16 2020
SC Court of Appeals

RE: Portfolio Recovery Associates LLC v. Jennifer Campney
Appellate Case No. 2020-000935

Dear Miss Kitchings:

Please let this letter serve as a motion for an extension of the time for the Appellant to serve and file her designation of matter to be included in the record on appeal. The current deadline was yesterday October 15, 2020, at which time Appellant filed her Initial Brief just prior to the deadline. However, due to several computer crashes involving Appellant's counsel's word processing program, which occurred due to unknown reasons beyond Appellant's counsel's control, Appellant's counsel had to recreate over an hour and a half of lost work on the Initial Brief as a result of work lost during those crashes, which prevented Appellant's counsel from being able to file Appellant's Designation of Matter until about 1:23 am today, which means that it was almost an hour and a half late, for which reason Appellant respectfully requests that the court extend the deadline to file this document by about an hour and a half, to make that late filing timely. Appellant's counsel is very sorry for this unexpected delay in filing that document, but does not believe that opposing counsel can be prejudiced by it, since it is unlikely that anyone other than myself is awake at this hour, which is approaching 2:00 am at this time. If the court feels that it would be necessary for me to brief this motion, then I will be happy to do so, but would prefer to avoid that work if it is not necessary.

Also, I hereby certify that I have served a copy of this letter motion on all other parties to this appeal by simultaneous email only as indicated below.

I have been unable to communicate with counsel for all opposing parties before filing this motion, due to the fact that they are probably all asleep anyway, and it is urgent that this motion be filed as soon as possible. Of course, if any of them have any objections to this motion, then I would request that they make that

known, either simply by email to the court staff handling this case, or by such other means as the court may indicate.

/s/ John R. Cantrell, Jr.

Cantrell Legal, PC

PO Box 1276

Goose Creek, South Carolina 29445-1276

(843) 797-2454

Attorney for Appellant

cc : Joseph E. Brown via email only to JBrown@coolingwinter.com
S. Louis Schiappa via email only to lschiappa@coolingwinter.com
J. Ronald Jones, Jr. via email only to RJones@smithdebnamlaw.com
Caren Enloe via email only to cenloe@smithdebnamlaw.com