

Reply to: Carmen V. Ganjehsani
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

December 16, 2020

Filed via e-mail (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

Dec 16 2020

SC Court of Appeals

Re: *Robin Napier v. Mundy's Construction, Inc.*
Appellate Case No. 2020-001103
Case No.: 2016-CP-02-0263
RPR File No.: 119-136

Dear Ms. Kitchings:

As counsel for the Respondent Mundy's Construction, Inc., we respectfully request a 30-day extension of time in which to serve and file our Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal. The Brief and Designations are currently due on Monday, December 21, 2020. However, with a 30-day extension of time, they would be due on Wednesday, January 20, 2021.

We find it necessary to request this extension due to the undersigned's current workload, including filings with the United States District Court for the District of South Carolina and motions for summary judgment with the State's circuit courts. This is our first request for an extension of time to serve and file the Initial Respondent's Brief and Designation of Matter.

Pursuant to Section (l)(1) of the Supreme Court's Amended Order dated May 29, 2020, we understand the filing fee for this request is waived. Pursuant to Section (g)(3) of the Order, I am notifying counsel of record of this correspondence via e-mail.

Sincerely,

/s/ Carmen V. Ganjehsani

Carmen V. Ganjehsani

cc: Justin O'Toole Lucey (jlucey@lucey-law.com)
David A. Anderson, Esq. (FYI)
James B. Robey, III (FYI)