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Jan 19 2021

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM AIKEN COUNTY
COURT OF COMMON PLEAS
THE HONORABLE J. CORDELL MADDOX, JR.
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2020-001103
CIVIL ACTION NO. 2016-CP-02-00263

Robin Napier, individually and on behalf of all others
similarly situated,

APPELLANT,

versus

Mundy's Construction, Inc. d/b/a Mundy Construction,

RESPONDENT.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondent, Mundy's Construction, Inc. d/b/a Mundy Construction, and Designation of Matter to be Included in the Record on Appeal were originally due on December 21, 2020. At the Respondent's request, the Court granted a 30-day extension of time, until January 20, 2021, to serve and file the Respondent's Initial Brief and Designation of Matter. The Respondent, Mundy's Construction, Inc. d/b/a Mundy Construction, respectfully requests the Court to grant a second extension of 20 days, or until Tuesday, February 9, 2021, to serve and file its Initial Brief of Respondent and Designation of Matter.

Counsel for the Respondent requests a second extension due to her current workload, holiday vacation, and missed time from work due to a wrist fracture.

Counsel for the Respondent has contacted the Appellant's counsel and he consents to this request as indicated in the attached document.

Accordingly, the Respondent, Mundy's Construction, Inc. d/b/a Mundy Construction, respectfully requests an additional 20-day extension of time in which to serve and file its Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.



David A. Anderson
S.C. Bar No. 11550
Carmen V. Ganjehsani
S.C. Bar No. 73515
James B. Robey, III
S.C. Bar No. 102452
RICHARDSON, PLOWDEN & ROBINSON, PA
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**ATTORNEYS FOR RESPONDENT
MUNDY'S CONSTRUCTION, INC.
d/b/a MUNDY CONSTRUCTION**

January 19, 2021.

EXHIBIT "A"

Carmen Ganjehsani

From: Carmen Ganjehsani
Sent: Wednesday, January 13, 2021 12:28 PM
To: 'Justin Lucey'
Cc: Lee Weiland; Anna McCann
Subject: RE: 2020-001103 Napier v. Mundy's Construction

An extra 20 days should be good.

From: Justin Lucey [mailto:jlucey@lucey-law.com]
Sent: Wednesday, January 13, 2021 12:07 PM
To: Carmen Ganjehsani
Cc: Lee Weiland; Anna McCann
Subject: Re: 2020-001103 Napier v. Mundy's Construction

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

sure. what do you need, 20 days ? sorry to hear about your wrist.


On Wed, Jan 13, 2021 at 11:52 AM Carmen Ganjehsani <CGanjehsani@richardsonplowden.com> wrote:

Mr. Lucey,

I am e-mailing to request your consent to one additional extension to file my Initial Respondent's Brief and Designations in the above-referenced matter. I fractured my wrist over Christmas which has made typing more difficult. I am due to have the cast removed in about a week and a half and would appreciate the additional time.

Thank you,

Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Shareholder Cganjehsani@RichardsonPlowden.com	
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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondent Mundy's Construction, Inc. d/b/a Mundy Construction, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated January 19, 2021, by personally serving the same pursuant to Section (g)(3) of the Supreme Court's Amended Order dated May 29, 2020, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Justin O'Toole Lucey
JUSTIN O'TOOLE LUCEY, PA
415 Mill Street
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jlucey@lucey-law.com
Attorney for Appellant



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**ATTORNEYS FOR RESPONDENT
MUNDY'S CONSTRUCTION, INC. d/b/a
MUNDY CONSTRUCTION**

Dated: January 19, 2021.