

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

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Feb 10 2021

SC Court of Appeals

**APPEAL FROM CHARLESTON COUNTY
JENNIFER B. MCCOY, CIRCUIT COURT JUDGE**

Appellate Case No.
2020-001335

GENEVIEVE STRATOS, RESPONDENT,

v.

**CHARLESTON COUNTY SHERIFF'S OFFICE AND
KARMATIC, LLC, DEFENDANTS.**

OF WHICH

KARMATIC, LLC, IS THE APPELLANT.

**RESPONDENT'S MOTION FOR EXTENSION TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER**

WHEREAS Appellant's Brief and Designation of Matter for Inclusion in the Record on Appeal in this matter has been filed and counsel just learned that a letter is being sent by the Court indicating that Respondent's initial brief and designation is due February 16, 2021, and counsel for Respondent needs an extension of time to file her initial brief as well as Designation of Matter to be included in the Record on

Appeal, due to various reasons, including that counsel has been participating in and preparing for multiple CLE presentations and otherwise has limited time to respond; and

WHEREAS counsel for Appellant consents to an extension;

Counsel for Respondent hereby moves for an extension to allow Respondent to file her initial brief and Designation of Matter to be Included in the Record on Appeal in this matter no later than March 16, 2021.

KAHN LAW FIRM, LLP



JUSTIN S. KAHN

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ATTORNEYS FOR RESPONDENT STRATOS

FEBRUARY 10, 2021

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PROOF OF SERVICE

JUSTIN S. KAHN
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COUNSEL FOR RESPONDENT

I, Justin S. Kahn, do hereby affirm that on February 10, 2021, I served one copy of Respondent's Motion for Extension to File Initial Brief and Designation of Matter on the following named individuals by email:

Elizabeth J. Palmer, Esq.
Rosen Hagood LLC
151 Meeting St., Ste. 400
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Attorney for Appellant Karmatic, LLC

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CHARLESTON, SC
FEBRUARY 10, 2021

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**ELLIS I. KAHN*[^]
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February 10, 2021

VIA EMAIL

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

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Feb 10 2021

SC Court of Appeals

**Re: Genevieve Stratos v. Charleston County Sheriff's Office and Karmatic, LLC
Appellate Case No.: 2020-001335**

Dear Ms. Kitchings:

Attached for filing is Respondent's Motion for Extension to File Initial Brief and Designation of Matter, along with Proof of Service. By copy of this letter I am serving our motion on counsel for Appellant.

With best regards, I am

Yours respectfully,


Justin S. Kahn

JSK/pm

Attachments

cc: Elizabeth J. Palmer, Esq.
Edward L. Knisley, Jr., Esq.

* SOUTH CAROLINA AND DISTRICT OF COLUMBIA

[^] BOARD CERTIFIED BY THE NATIONAL BOARD OF TRIAL ADVOCACY IN CIVIL TRIAL ADVOCACY AND
THE AMERICAN BOARD OF PROFESSIONAL LIABILITY ATTORNEYS IN MEDICAL MALPRACTICE