

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Jean Hoefer Toal, Chief Justice of the  
South Carolina Supreme Court (Retired),  
Acting as Circuit Court Judge

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Case No. 2008-CP-23-3665

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William F. Tomz and Francis W. Tomz,  
Individually and as Class Representatives,

Respondents,

v.

Capital Investment Funding, and  
Arthur M. Field, Defendants,  
Of Whom Arthur M. Field is the Appellant.

In Re: Kathryn Taillon,

Appellant.

**RECEIVED**

**May 24 2021**

**SC Court of Appeals**

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APPELLANT TAILLON'S SECOND MOTION FOR AN EXTENSION OF TIME  
TO FILE INITIAL BRIEF AND DESIGNATION OF  
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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Appellant Kathryn Taillon hereby moves the Court for a second thirty (30) day extension  
within which to file her Initial Brief and Designation of Matter to be Included in the Record on

Appeal. Such requested extension would move the applicable deadline from June 1, 2021 to July 1, 2021.

The basis for this request is that the undersigned counsel has had a case in the U.S. District Court for the District of South Carolina set for trial on June 2, 2021. *Naji v. Fluor Federal Services, LLC*, 6:19-cv-01774-HMH. (Attach. A.) The trial is expected to last three to four business days. The case was initially placed on the June 2021 trial roster on May 4, 2021. At that time, the undersigned expected to have the flexibility to prepare the initial brief and designation of matter to be included in the record on appeal prior to trial in mid-June. However, on May 19, 2021, the trial itself was scheduled for June 2, 2021. (Attach. A.) Since then, the undersigned, a sole practitioner, has been entirely consumed with trial preparation. Given the expected length of trial and need to prepare and respond to post-trial motions, the undersigned respectfully submits that without a 30-day extension he will not be able to provide competent representation in both matters. Appellant Taillon therefore moves for an extension of the applicable deadline until July 1, 2021.

May 24, 2021



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Jeffrey P. Dunlaevy (SC Bar No. 19678)  
Dunlaevy Law Firm  
37 Villa Road, Suite 440  
Greenville SC 29615  
864.208.9305  
Counsel for Appellant Kathryn Taillon

May 24 2021

SC Court of Appeals

**Jeffrey Dunlaevy**

**From:** SCDEfilingstat@scd.uscourts.gov  
**Sent:** Wednesday, May 19, 2021 12:44 PM  
**To:** scd\_ecf\_nef@scd.uscourts.gov  
**Subject:** Activity in Case 6:19-cv-01774-HMH Naji v. Fluor Federal Services LLC Notice of Hearing

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

District of South Carolina

**Notice of Electronic Filing**

The following transaction was entered on 5/19/2021 at 12:43 PM EDT and filed on 5/19/2021

**Case Name:** Naji v. Fluor Federal Services LLC

**Case Number:** 6:19-cv-01774-HMH

**Filer:**

**Document Number:** 72(No document attached)

**Docket Text:**

**NOTICE of Hearing: Jury Selection set for Wednesday, 6/2/2021, 09:00 AM in Greenville #3, Clement F Haynsworth Fed Bldg, 300 E Washington St, Greenville before Honorable Henry M Herlong Jr.**

**Jury Trial set for Wednesday, 6/2/2021, IMMEDIATELY FOLLOWING JURY SELECTION in Greenville #3, Clement F Haynsworth Fed Bldg, 300 E Washington St, Greenville before Honorable Henry M Herlong Jr. (kmca)**

**6:19-cv-01774-HMH Notice has been electronically mailed to:**

Susan Pedrick McWilliams smcwilliams@nexsenpruet.com, fhowle@nexsenpruet.com,  
mbuonforte@nexsenpruet.com, mjump@nexsenpruet.com

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**6:19-cv-01774-HMH Notice will not be electronically mailed to:**

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Of Whom Arthur M. Field is the Appellant.

In Re: Kathryn Taillon, Appellant.

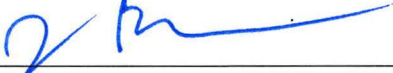
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PROOF OF SERVICE

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I certify that I have served Kathryn Taillon's Second Motion for an Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal on the below-listed Counsel of Record by electronic mail (copy attached) on May 24, 2021.

May 24, 2021

  
Jeffrey P. Dunlaevy (SC Bar No. 19678)  
Dunlaevy Law Firm  
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## Jeffrey Dunlaevy

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**From:** Jeffrey Dunlaevy  
**Sent:** Monday, May 24, 2021 8:59 AM  
**To:** scase@butlermeans.com; gbrandt@hbvlaw.com; gconnell@classactlaw.net; Rodney@PillsburyFirm.law; Micah Caskey  
**Subject:** Tomz v. CIF et. al. - Taillon Second Motion for Extension of Time  
**Attachments:** Taillon 2nd Motion for Extension to File Initial Brief.pdf

Dear Counsel:

Please find attached Appellant Kathryn Taillon's Second Motion for an Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully,

Jeff Dunlaevy

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May 24 2021

SC Court of Appeals



**Jeffrey P. Dunlaevy**

Dunlaevy Law Firm

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