

**RECEIVED**  
**Aug 09 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master-In-Equity  
Ninth Judicial Circuit

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Case No. 2016-CP-10-1560  
Appellate Case No. 2017-002546

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Carpenter Braselton, LLC, .....Appellant,

vs.

Ashley Roberts, Jeremy Cook, and Salaheddine Ezzaoudi, ..... Respondents.

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**RESPONDENTS' CONSENT MOTION  
FOR EXTENSION OF TIME TO FILE THEIR  
RETURN TO APPELLANT'S PETITION  
FOR REHEARING *EN BANC***

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Pursuant to the South Carolina Appellate Court Rules, Respondents Ashley Roberts, now known as Ashley Roberts Cyronak, Jeremy Cook, and Salaheddine Ezzaoudi, by and through their undersigned counsel, hereby move the Court for an order granting Respondents a 7-day extension of time, until August 23, 2021, in which to file and serve Respondents' Return to Appellant's Petition for Rehearing *En Banc*. Respondents' Return to Appellant's Petition for Rehearing *En Banc* is currently due August 16, 2021.

Respondents would submit that this extension request is not intended for purposes of delay but, rather, is necessary due to counsel's work commitments and the fact that one of the

undersigned's colleagues, an associate attorney who will be assisting the undersigned in this matter, will be on vacation from August 9, 2021 through August 13, 2021.

Respondents would further submit that no prejudice will inure to the Appellant by the granting of this Motion. In addition, counsel for the Appellant has communicated to the undersigned that he consents to the granting of this motion.

Respectfully submitted,

**CALLISON TIGHE & ROBINSON, LLC**

*s/ Demetri K. Koutrakos*  
Demetri K. Koutrakos, SC Bar No. 11318  
Harry A. Dixon, SC Bar No. 103509  
1812 Lincoln Street, Suite #200  
P. O. Box 1390  
Columbia, SC 29202-1390  
Telephone: 803-404-6900  
Email: [jimkoutrakos@callisontighe.com](mailto:jimkoutrakos@callisontighe.com)

**Attorneys for Respondents**

August 9, 2021

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Carpenter Braselton, LLC, .....Appellant,

vs.

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**PROOF OF SERVICE**

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I hereby certify that, on this date, the **Respondents' Consent Motion for Extension of Time to File Their Return to Appellant's Petition for Rehearing *En Banc*** was served on Appellant's counsel via AIS email, pursuant to Supreme Court Order dated March 20, 2020, as amended on May 29, 2020, as follows:

Daniel F. Blanchard, III, Esquire  
Rosen Hagood, LLC  
151 Meeting Street, Suite #400  
Charleston, SC 29501  
Email: [dblanchard@rosenhagood.com](mailto:dblanchard@rosenhagood.com)

John E. Rosen, Esquire  
J. Rosen Law, LLC  
P. O. Box 1880  
Folly Beach, SC 29439  
Email: [john@jrosen-law.com](mailto:john@jrosen-law.com)

Liam D. Duffy, Esquire  
Yarborough Applegate, LLC  
291 East Bay Street, 2<sup>nd</sup> Floor  
Charleston, SC 29401  
Email: [liam@yarboroughapplegate.com](mailto:liam@yarboroughapplegate.com)  
(Attorneys for Appellants)

A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

*s/ Demetri K. Koutrakos*  
Demetri K. Koutrakos

August 9, 2021  
Columbia, South Carolina

## Kathy Romero

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**From:** Kathy Romero  
**Sent:** Monday, August 9, 2021 1:41 PM  
**To:** dblanchard@rosenhagood.com; john@jrosen-law.com;  
liam@yarboroughhapplegate.com  
**Cc:** Jim Koutrakos; Harry Dixon  
**Subject:** RE: Carpenter Braselton, LLC vs. Ashley Roberts, et al. / Appellate Case No. 2017-002546  
**Attachments:** Clerk.001.pdf; Extension Motion-Return.pdf; POS - Return.pdf

Dear Counsel,

Attached please find a letter to the appellate clerk, Respondents' Consent Motion for Extension of Time to File Their Return to Appellant's Petition for Rehearing *En Banc*, and Proof of Service regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing. Thank you.

With kind regards,

Kathy Romero  
Legal Assistant to Demetri "Jim" K. Koutrakos, Esq.  
and Harry A. Dixon, Esq.  
Callison Tighe & Robinson, LLC  
1812 Lincoln Street, Suite #200  
P. O. Box 1390  
Columbia, SC 29202-1390  
Telephone: 803-404-6900  
Email: [kathyromero@callisontighe.com](mailto:kathyromero@callisontighe.com)

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Demetri "Jim" K. Koutrakos - MEMBER  
803-404-6900  
[JimKoutrakos@callisontighe.com](mailto:JimKoutrakos@callisontighe.com)

**RECEIVED**

**Aug 09 2021**

**SC Court of Appeals**

August 9, 2021

**VIA EMAIL:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

RE: Carpenter Braselton, LLC vs. Ashley Roberts, *et al.*  
Appellate Case No. 2017-002546

Dear Ms. Kitchings:

Enclosed herewith please find the Respondents' Consent Motion for Extension of Time to File Their Return to Appellant's Petition for Rehearing *En Banc*, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email. It is my understanding that, pursuant to Supreme Court Order dated March 20, 2020, as amended, no filing fee is required for this Motion. Appellant's counsel has consented to this extension as indicated in the Motion.

The enclosed documents have been served upon Appellant's counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

*s/ Demetri "Jim" K. Koutrakos*

Demetri "Jim" K. Koutrakos

DKK:ksr  
Enclosures  
cc (via email only): Daniel F. Blanchard, III, Esquire  
John E. Rosen, Esquire  
Liam D. Duffy, Esquire  
Harry A. Dixon, Esquire

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