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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

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Case No. 2019-CP-38-00786  
Appellate Case No. 2021000336

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Kevin Reid and LaDonna Rowland, Plaintiffs,

v.

Robert Bethea, III d/b/a Bethea's Funeral Home, Bethea Funeral Home, LLC, d/b/a Bethea's Funeral Home, Belleville Memorial Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, Belleville Memorial Gardens, LLC, Crestlawn Memorial Cemetery of SC, Inc. d/b/a Crestlawn Memorial Gardens, and Crestlawn Memorial Gardens, LLC, Defendants,

Of which Ladonna Rowland is the Respondent and Belleville Memorial Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, LLC is the Appellant.

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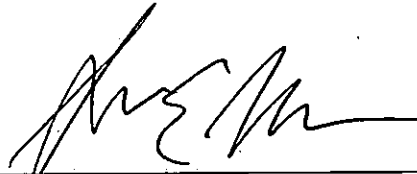
**MOTION FOR EXTENSION TO FILE  
RESPONDENT'S FINAL BRIEF**

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Respondent respectfully requests that the time period for filing Respondent's Final Brief required under Rule 211(a), *SCRAP*, be extended until October 13, 2021. The basis for this request is that the claims in the underlying action are scheduled to be mediated on October 6, 2021, and the parties are hopeful that mediation will resolve this matter. Resolution of the underlying claims would result in the parties dismissing this Appeal, thus

alleviating the need for Final Briefs and creating judicially economic for both the parties and the Court.

Respectfully submitted,



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Andrew E. Haselden  
HOWSER, NEWMAN & BESLEY, LLC  
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***Attorneys for Respondent***

August 31, 2021

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In The Court of Appeals

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Kevin Reid and LaDonna Rowland, Plaintiffs,

v.

Robert Bethea, III d/b/a Bethea's Funeral Home, Bethea Funeral Home, LLC,  
d/b/a Bethea's Funeral Home, Belleville Memorial Gardens of SC, Inc. d/b/a  
Belleville Memorial Gardens, Belleville Memorial Gardens, LLC, Crestlawn  
Memorial Cemetery of SC, Inc. d/b/a Crestlawn Memorial Gardens, and  
Crestlawn Memorial Gardens, LLC, Defendants,

Of which Ladonna Rowland is the Respondent and Belleville Memorial  
Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, LLC is the Appellant.

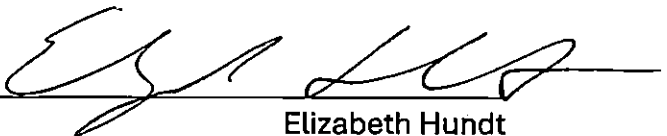
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**Proof of Service as to Respondent's  
Motion for Extension to File Final Brief**

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I, the undersigned employee of Howser, Newman & Besley, LLC, hereby certify that pursuant to Rules 208 (a)(2) and 262(b), SCACR, I have served the Initial Brief of Respondent in this matter on all counsel of record by mailing a copy, United States Mail, postage prepaid, on August 31, 2021, to the following addresses:

Stephen D. Porter  
Kevin Maroney  
Rogers, Lewis, Jackson, Mann & Quinn, LLC  
P.O. Box 11803  
Columbia, SC 29211  
***Attorneys for Appellant***

  
Elizabeth Hundt  
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R. Davis Howser  
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Kelley Shull Cannon^  
Andrew E. Haselden<  
George V. Hanna, IV\*  
Michal Cooper Jones  
Kyliene L. Keesley^  
Albert Richard Pierce, Jr.\*  
James P. Sullivan  
Andrew L. Hethington

William G. Besley (1964-2018)

< Certified Circuit Court Mediator  
^ Certified Circuit Court Mediator and Arbitrator  
\* Also Admitted in North Carolina

# HNB

## HOWSER, NEWMAN & BESLEY, LLC

*Attorneys and Counselors at Law*

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August 31, 2021

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

RE: Reid & Rowland v. Bethea, et al.  
C. A. No.: 2019-CP-38-00786  
Appellate Case No.: 2021-336

Dear Ms. Kitchings:

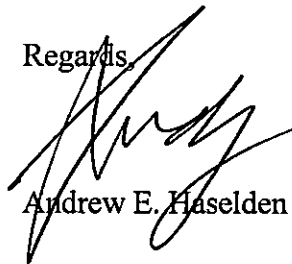
Enclosed for filing are an original and six (6) copies each of the following documents in the above-captioned action:

- *Motion for Extension to File Respondent's Final Brief*
- *Proof of Service with respect to the Motion for Extension*

We are also forwarding a check in the amount of \$50.00 for the filing fee. Please return the filed copies via the enclosed envelope.

By copy of this letter, I am serving all parties to the appeal with copies of each of the above-described documents via their attorneys of record. Thank you for your assistance in this matter and please do not hesitate to contact me with any questions or concerns.

Regards,



Andrew E. Haselden

AEH/elh

Enclosures:

Stephen D. Porter, Esq.  
Kevin Maroney, Esq.

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SC Court of Appeals

**HOWSER, NEWMAN &  
BESLEY, LLC**  
15 East Bay Street, Suite 303  
Charleston, SC 29401

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**HNB**

**HOWSER, NEWMAN  
& BESLEY, LLC**

*Attorneys and Counselors at Law*  
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