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Dec 17 2021

SC Court of Appeals

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

Appeal from Horry County
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2015-CP-26-05573
Appellate Case No. 2018-002009

K.A. Diehl and Associates, Inc.,

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins,
Mark Dos Santos, William Moore, Steven Dame
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Appellant.

**APPELLANT'S CONSENT TO RESPONDENT'S MOTION
FOR EXTENSION OF TIME TO FILE/SERVE REPLY**

CLEMENT RIVERS, LLP
D. Jay Davis Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 577-4000

Attorneys for Appellant

I, the undersigned attorney for Appellant, am in receipt of Respondent's Motion for Extension of Time to File/Serve Reply ("Respondent's Motion for Extension"), which requests a 15-day extension of Respondent's deadline to file/serve a reply to Appellant's return (filed/served December 15, 2021) to Respondent's pending Motion to Dismiss the Appeal and Counterclaims.

On review of Respondent's Motion for Extension, I see that it concludes: "The undersigned [(Alicia E. Thompson, Esquire)] has consulted with Appellant's counsel who did not respond to Respondent's request for consent."

With apologies to Ms. Thompson, I was out of the office yesterday afternoon when she emailed requesting consent and had overlooked her email until now.

Please allow this to confirm that, of course, Appellant has no objection whatsoever to Respondent being granted the additional time requested and hereby consents to Respondent's Motion for Extension.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Russell G. Hines (SC Bar No. 72100)
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Attorneys for Appellant

Charleston, South Carolina

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PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorney for Appellant, hereby certify that **APPELLANT'S CONSENT TO RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE/SERVE REPLY** was served on Respondent on December 17, 2021, via email (see attached) to Respondent's counsel of record:

Henrietta U. Golding, Esquire
hgolding@burr.com
Alicia E. Thompson, Esquire
athompson@burr.com
Burr & Forman, LLP
P.O. Box 336
Myrtle Beach, SC 29578
Attorneys for Respondent
K.A. Diehl and Associates, Inc.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina

December 17, 2021

Hines, Russell

From: Hines, Russell
Sent: Friday, December 17, 2021 6:29 PM
To: Golding, Henrietta; Thompson, Alicia
Cc: Davis, Jay; Bell, Pollyana (Polly); Voegel, Taylor; 'Evans, Sheila'; Justman, Aimee
Subject: K.A. Diehl v. Perkins (Appellate Case No. 2018-002009) -- Appellant's Consent to Respondent's Motion for Extension re Reply
Attachments: K.A. Diehl v. Perkins (2018-002009) -- Consent to Respondent's Motion for Extension re Reply.pdf

Attached regarding the above-referenced matter please find **Appellant's Consent to Respondent's Motion for Extension of Time to File/Serve Reply.**

Russell G. Hines
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