

**RECEIVED**  
**Apr 13 2022**  
**SC Court of Appeals**

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

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

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Case No.: 2021-CP-40-00206

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Rumsey Construction & Renovation, LLC dba Rumsey Construction  
& Restoration, .....Appellant,

v.

Thomas and Stacy Lanham, .....Respondents,

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF APPELLANT**

COMES NOW Appellant Rumsey Construction & Restoration, LLC dba Rumsey Construction & Restoration (“Rumsey”) by and through it undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days’ additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Rumsey respectfully requests that this deadline be extended by 30 days (from April 13, 2022), i.e., through May 13, 2022. Respectfully, Rumsey believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Rumsey moves this Honorable Court to grant it an additional extension of 30 days’ time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving

its initial brief and designation of matter would be May 13, 2022, according to the undersigned's calculations. Further, Rumsey respectfully requests that the Court hold its present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

THE WARD LAW FIRM, P.A.  
Attorneys for Appellant Rumsey Construction &  
Renovation, LLC dba Rumsey Construction &  
Restoration

s/John E. Rogers, II  
John E. Rogers, II, (SC Bar #72779)  
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Richland, South Carolina

April 13, 2022

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**CERTIFICATE OF COUNSEL**

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In accordance with Rule 211(b), SCACR, the undersigned certifies that the Motion for Extension of Time to File/Serve Initial Brief of Appellant complies with the Supreme Court Order of August 25, 2021.

THE WARD LAW FIRM, P.A.  
Attorneys for Defendant Appellant Rumsey  
Construction & Renovation, LLC dba  
Rumsey Construction & Restoration

s/John E. Rogers, II  
John E. Rogers, II, (SC Bar #72779)  
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**PROOF OF SERVICE**

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The undersigned hereby certifies that on April 13, 2022, it served the foregoing Motion for Extension of Time to File/Serve Initial Brief of Appellant on Behalf of Appellant Rumsey Construction & Renovation, LLC dba Rumsey Construction & Restoration via email (attached hereto as Exhibit A) containing the above-referenced document to all counsel of record’s individual AIS email addresses pursuant to the SC Supreme Court COVID Order 2020-05-29-02. A list of counsel served is as follows:

Joshua P. Cantwell, Esquire  
Cantwell Law Firm, LLC  
PO Box 600  
Charleston, SC 29402  
843-801-4104  
[josh@cantwelllawfirm.org](mailto:josh@cantwelllawfirm.org)

(SIGNATURE PAGE TO FOLLOW)

**By:**

THE WARD LAW FIRM, P.A.

Attorneys for Appellant Rumsey Construction & Renovation, LLC dba Rumsey Construction & Restoration

s/John E. Rogers, II

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Email: [jrogers@wardfirm.com](mailto:jrogers@wardfirm.com)

April 13, 2022

## Kirby Parham

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**From:** Kirby Parham  
**Sent:** Wednesday, April 13, 2022 1:04 PM  
**To:** 'josh@cantwelllawfirm.org'  
**Cc:** John Rogers; 'freeman@belsarpa.com'  
**Subject:** Rumsey Construction & Renovation v. Thomas and Stacy Lanhan  
**Attachments:** Certificate of Counsel.pdf; Appellant's Mot for Ext of Time to File Initial Brief.pdf

Mr. Cantwell

**Please see attached Return to Appellant's Motion for Extension of Time to File Initial Brief and Certificate of Counsel being filed with the SC Supreme Court today. Please let us know if you have any questions, or if you need anything further.**

Thank you,

Kirby P. Parham  
Paralegal to John E. Rogers, II  
The Ward Law Firm  
PO Box 5663  
Spartanburg, SC 29304

In light of the April 3, 2020 Order of the South Carolina Supreme Court (Order 2020-04-03-01), we will be serving discovery and motions via email only.

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