

**RECEIVED**

**Aug 26 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENWOOD COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Appellate Case No. 2021-001400

IOS, LLC,.....Appellant-Respondent,

v.

Lander University, .....Respondent-Appellant.

**RESPONDENT-APPELLANT’S MOTION FOR EXTENSION OF TIME  
TO FILE AND SERVE THEIR REPLY BRIEF TO APPELLANT-RESPONDENT'S  
INITIAL BRIEF AND RESPONDENT-APPELLANT'S FINAL BRIEF**

Respondent-Appellant, by and through their undersigned counsel hereby moves this Honorable Court for a final thirty (30) day extension of time to file and serve their Reply Brief and Final Brief pursuant to Rule 263, SCACR and Order of the Supreme Court of South Carolina dated July 16, 2014. This is Respondent-Appellant's third and final request for an extension.

Respondent-Appellant submits the following as good cause for the relief sought herein.

1. The current deadline for Respondent-Appellant to file and serve their Initial Reply Brief is August 31, 2022. The current deadline for Respondent-Appellant to file and serve their Final Brief is September 6, 2022.

2. Counsel for Respondent-Appellant's twenty-eight year-old son passed away unexpectedly in Colorado on July 18, 2022. Counsel took a leave of absence to attend to her son's affairs, and has recently begun working part-time while still attempting to handle the remaining affairs of her son. This request is not intended to delay the ultimate disposition of this matter, and Appellant-Respondent's counsel has consented to the final extension.

3. A thirty (30) day extension would make Respondent-Appellant's Reply Brief now due on September 30, 2022, and Respondent-Appellant's Final Brief now due on October 6, 2022.

Respondent-Appellant respectfully requests the Court grant a final thirty (30) day extension of time for Respondent-Appellant to file and serve their Reply Brief and Final Brief.

*s/Lena Y. Meredith*

Lena Y. Meredith (SC Bar #9663)  
Nicholson, Meredith & Anderson, LLC  
109 West Court Avenue  
Post Office Box 457  
Greenwood, SC 29648  
(864) 229-7241  
(803) 229-2739 (fax)  
*Attorney for Respondent-Appellant*

August 26, 2022

Other Counsel of Record:

James E. Smith, Jr. (SC Bar 8733)  
James E. Smith, Jr., PA  
1422 Laurel Street  
Post Office Box 50333  
Columbia, South Carolina 29250

*Attorney for Appellant-Respondent*

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served counsel for Appellant-Respondent James E. Smith, Jr., Esquire, with a copy of *Respondent-Appellant's MOTION FOR EXTENSION OF TIME TO FILE AND SERVE THEIR REPLY BRIEF TO APPELLANT-RESPONDENT'S INITIAL BRIEF AND FINAL BRIEF* by emailing the same to the following AIS email address:

James E. Smith, Jr., Esquire  
[james@jamesmithpa.com](mailto:james@jamesmithpa.com)  
*Counsel for Appellant-Respondent*

August 26, 2022

*s/Lena Y. Meredith*  
Lena Y. Meredith (SC Bar 9663)  
*Attorney for Respondent-Appellant*

# NICHOLSON MEREDITH & ANDERSON, LLC

ATTORNEYS AT LAW

W.H. Nicholson, III  
Lena Y. Meredith \*

109 West Court Avenue (29646)  
P. O. Box 457  
Greenwood, SC 29648

864-229-7241 Phone  
864-229-2739 Fax

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Jennings B. Anderson  
W.H. Nicholson, IV

www.nicholsonmeredith.com

\_\_\_\_\_  
\* Certified Mediator/Arbitrator

August 26, 2022

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Via Email to Ctappfilings@sccourts.org  
1220 Senate Street  
Post Office Box 11629  
Columbia, South Carolina 29201

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**SC Court of Appeals**

Re: IOS, LLC v. Lander University  
Appellate Case No.: 2021-001400

Dear Ms. Kitchings:

Enclosed please find the Respondent-Appellant's Motion for Extension of Time to File and Serve their Reply Brief and Final Brief with Proof of Service in the above-referenced matter. I am enclosing my firm check in the amount of Fifty and 00/100 (\$50.00) Dollars for the filing fee.

Appellant- Respondent's counsel does not object and by copy of the same, I am hereby serving him,

The filing fee is being sent by first class US Mail. I would appreciate your assistance with filing the attached and returning clocked copies.

Sincerely,

*s/Lena Y. Meredith*  
Lena Y. Meredith  
Nicholson, Meredith & Anderson, LLC  
109 W. Court Avenue  
Post Office Box 457  
Greenwood, SC 29648  
(864) 229-7241