

**RECEIVED**

**Sep 08 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
Court of Appeals

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APPEAL FROM FLORENCE COUNTY  
Clifton Newman, Circuit Court Judge

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Case No.: 2022-000907

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Shaileshkumar Patel.....Appellant,

v.

Florence Investment, LLC d/b/a Microtel Inn & Suites and  
John Doe,.....Respondents.

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NOTICE AND MOTION FOR EXTENSION OF TIME  
TO FILE AND SERVE  
APPELLANT’S INITIAL BRIEF  
AND  
DESIGNATION OF MATTER,  
OR TO FILE SAME OUT OF TIME

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COMES NOW the Appellant, Shaileshkumar Patel (“Appellant”), and files this Notice and Motion for Extension of Time to Serve and File Appellant’s Initial Brief and Designation of Matter, or to file same out of time. Appellant would respectfully request that this Court issue an Order granting this Motion and allow Appellant a reasonable period of time beyond today’s deadline to file and serve Appellant’s Initial Brief and Designation of Matter. Appellant submits that the granting of this Motion is in the best interest of justice and Counsel for Respondents agree to this filing. Appellant respectfully requests an extension of time in which to file the Initial Brief and Designation of Matter.

WHEREFORE, Appellant prays that this Court allow Appellant to file his Initial Brief and Designation of Matter out of time.

LAW OFFICE OF  
DARRELL THOMAS JOHNSON, JR., LLC

By: 

Joshua R. Fester

S.C. Bar No: 102241

Warren P. Johnson

S.C. Bar No: 71759

300 Main Street

P.O. Box 1125

Hardeeville, South Carolina 29927

(843) 784-2142

*Attorneys for the Plaintiff*

Dated: September 8<sup>th</sup>, 2022

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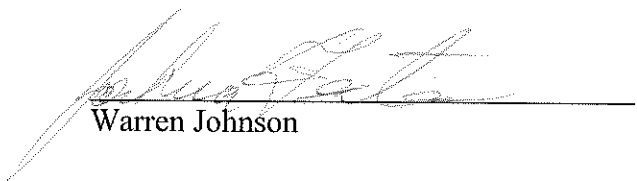
v.

Florence Investment, LLC d/b/a Microtel Inn & Suites and  
John Doe,.....Respondents.

PROOF OF SERVICE

I hereby certify that on the 8<sup>th</sup> day of September, 2022 I served a true and accurate copy of the foregoing Motion for Extension of Time to File and Service Initial Brief and Designation of Matter, on the parties listed below by placing the same in the United States mail, first class postage attached, and addressed to the following:

John L. McDonald, Jr., Esquire  
126 Seven Farms Drive, Suite 200  
Charleston, South Carolina 29492

  
Warren Johnson

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**SC Court of Appeals**

**LAW OFFICES OF  
DARRELL THOMAS JOHNSON, JR., LLC  
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POST OFFICE BOX 1125  
HARDEEVILLE, SOUTH CAROLINA 29927**

DARRELL THOMAS JOHNSON, JR. \*  
MILLS L. MORRISON, JR. \*\*  
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\* Certified Mediator  
\*\* Also Licensed in Georgia

September 8, 2022

**Via email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Shaileshkumar Patel v. Florence Investment, LLC d/b/a Microtel Inn and Suites  
and John Doe  
Appellate Case No: 2022-000907  
Our File No: 17-826-01-200-20

Dear Ms. Kitchings:

Please find enclosed our Motion for Extension of Time to File and Serve our Initial Brief and Designation of Matter with Proof of Service in the above matter. Please note that opposing Counsel consents to our Motion.

Additionally, I will be placing our check for the filing fee (\$50.00) in the US Mail to your office tomorrow, September 9, 2022. If you should require anything further, please contact this office.

With warmest regards,

LAW OFFICE OF  
DARRELL THOMAS JOHNSON, JR., LLC

  
Warren Johnson

WPJ/lmo/encs