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Nov 07 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.

APPELLANT-RESPONDENT’S MOTION FOR EXTENSION OF TIME

Appellant-Respondent, by and through their undersigned counsel and with the consent of Respondent-Appellant counsel, hereby moves this Honorable Court for a thirty (30) day extension of time pursuant to Rule 242, SCACR and Order of the Supreme Court of South Carolina dated July 16, 2014. This is Appellant-Respondent’s second request for an extension.

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

1. The current deadline for Appellant-Respondent to file and serve the Record on Appeal is November 7, 2022.
2. After twenty-six (26) years of practice with James E. Smith, Jr., P.A., Counsel for Appellant-Respondent has moved his practice to Nelson Mullins Riley & Scarborough, LLP.
3. The additional time is requested by Appellant-Respondent to allow counsel sufficient time to meet the deadlines of the Appeal with the competing demands of moving cases

and files, clearing conflicts, and adjusting to the procedures of a new firm.

4. Counsel for Respondent-Appellant consents to the extension of time requested herein.

5. A thirty (30) day extension would provide a new deadline of December 7, 2022.

Appellant-Respondent respectfully request the Court grant a thirty (30) day extension of time to December 7, 2022, for the current deadlines in the above-captioned Appeal.

November 7, 2022

s-James E. Smith, Jr.

James E. Smith, Jr. (SC Bar 8733)
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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below he served counsel for Petitioner, Lena Y. Meredith, Esq., with a copy of Appellant-Respondent’s *MOTION FOR EXTENTION OF TIME* by emailing the same to the following AIS email address:

Lena Y. Meredith, Esq.
Lena@nicholsonmeredith.com
Counsel for Respondent-Appellant

November 7, 2022

s-James E. Smith, Jr.
James E. Smith, Jr. (SC Bar 8733)
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November 7, 2022

Via First Class US Mail and Email CtAppFilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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Nov 07 2022

SC Court of Appeals

RE: IOS, LLC v. Lander University
Appellate Case No. 2021-001400
Filing Fee and Motion Fee Enclosed

Dear Madam Clerk:

I am attaching by email Appellant-Respondent's Motion for Extension of Time 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.

By copy of this letter to Petitioner's counsel, I am hereby service him with a copy of the same.

Thank you for your assistance.

With kind regards, I remain

Very truly yours,



James E. Smith, Jr.

JES

Enclosure as referenced

cc: Lena Y. Meredith, Esq., - *Via Email* Lena@nicholsonmeredith.com