

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

68697

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2011-CP-07-2300

Yossi Haina,

Appellant,

v.

Beach Market, LLC,

Respondent.

MOTION FOR EXTENSION OF TIME TO REPLY TO INTITAL BRIEF OF THE  
RESPONDENT

Marshall L. Horton, Esq., SC Bar No. 73891  
Lindsay Y. Goodman, Esq., SC Bar No.  
100273  
Post Office Box 3766  
Bluffton, South Carolina 29910  
(843) 757-6190  
ATTORNEYS FOR APPELLANT

Other Counsel of Record:  
John H. Tiller, Esquire  
Sarah P. Spruill, Esquire  
Haynesworth Sinkler Boyd, PA  
Post Office Box 340  
Charleston, South Carolina 29402  
Attorneys for Respondent  
843.722.3366  
843.722.2266 (facsimile)

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JUN 10 2013  
SC Court of Appeals

The Appellant in this above referenced action, Yossi Haina, by and through his undersigned counsel, hereby files this Motion for Extension of Time to Reply to Initial Brief of the Respondent. Pursuant to Rule 240, SCACR, the Appellant respectfully moves for an extension of time of 30 days, for the Appellant to Reply to the Initial Brief of the Respondent.

In support of this Motion for Extension of Time, the Appellant states the following:

1. The Appellant was served with the Initial Brief of Respondent on May 28, 2013. Pursuant to Rule 208, SCACR, the Appellant is currently required to file a response by June 7, 2013. Thus, this current Motion for Extension of Time has been filed before the date that the Appellant is required to respond.

2. The Attorney of Record on this matter, Marshall L. Horton, Esquire, is out of the country from June 1, 2013 until June 14, 2013 and will not return to the office until June 17, 2013.

3. This Motion is made in good faith and not for purposes of delay.

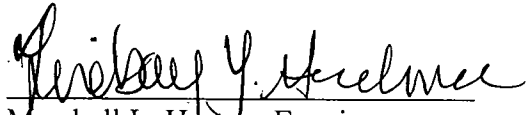
4. Counsel for the Respondent has been contacted and agreed to the Appellants 30-day extension to Reply to the Intital Brief of the Respondent.

WHEREFORE, Appellant respectfully requests that the Court grant this Motion and order the extension of time requested.

Respectfully Submitted,

[signature page to follow]

HORTON LAW FIRM, LLC

A handwritten signature in black ink, appearing to read "Lindsay Y. Goodman", is written over a horizontal line.

Marshall L. Horton, Esquire

Lindsay Y. Goodman, Esquire

17 Lawton Street

Post Office Box 3766

Bluffton, South Carolina 29910

(843) 757-6190

*ATTORNEY FOR THE APPELLANT*

Bluffton, South Carolina  
This 5<sup>th</sup> day of June, 2013

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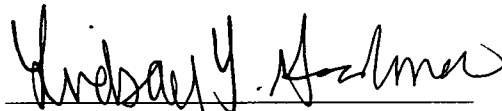
Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to Reply to Initial Brief of Respondent on Beach Market, LLC, by depositing a copy of it in the United States Mail, postage prepaid, on June 5, 2013, addressed to their attorneys of record, Stafford John McQuillen, III, Esquire, and Sarah P. Spruill, Esquire, Post Office Box 340, Charleston, South Carolina 29402 on June 5, 2013.

June 5, 2013

HORTON LAW FIRM, LLC



Marshall L. Horton, Esquire  
Lindsay Y. Goodman, Esquire  
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