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May 11 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM PICKENS COUNTY

Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No.: 2022-001332

Common Pleas Case No.: 2017-CP-39-00709

Andrew Pampu.....Appellant/Respondent,

v.

Erin Wingo, David Wingo, and Colin J. Gahagan.....Respondents/Appellants,

RESPONDENT/APPELLANT COLIN J. GAHAGAN'S MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF IN RESPONSE TO APPELLANT/RESPONDENT'S BRIEF

COMES NOW Respondent/Appellant Colin J. Gahagan who hereby requests a thirty (30) day extension of time to serve and file his Initial Respondent's Brief to Appellant/Respondent's brief of Pampu, due to upcoming trials. Respondent/Appellant Colin J. Gahagan has consulted with opposing counsel, who does not object to this request for the enlargement of time.

Respectfully submitted,

(Signature Block Intentionally on Next Page)

Turner Padget Graham & Laney

By: s/ David L. Moore, Jr.

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*Attorneys for Respondent/Appellant,*

*Colin J. Gahagan*

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PROOF OF SERVICE

I do hereby certify that I have served the Respondent/Appellant Colin J. Gahagan's Motion for Extension of Time to Serve and File Initial Brief in Response to Appellant/Respondent's Brief to all counsel of record on May 10, 2023, by *electronic mail only*, as follows:

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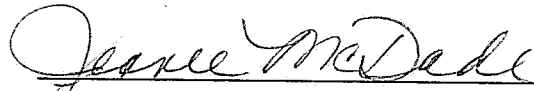
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*Attorneys for Colin J. Gahagan*



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Jeanie S. McDade, Legal Assistant to  
David L. Moore, Jr.

# Turner Padget

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May 10, 2023

*Sent Via Email and U.S. Mail / ctappfilings@sccourts.org*  
The Honorable Jenny Abbott Kitchings  
Clerk of Court / South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
**May 11 2023**  
**SC Court of Appeals**

Re: Andrew Pampu v. Erin Wingo, David Wingo and Colin J. Gahagan  
Appellate Case No.: 2022-001332  
*Filing of C. J. Gahagan's Motion for Extension of Time to Serve and File Initial Brief in Response to Appellant/Respondent's Brief*  
TPGL File No.: 1464.8223

Dear Ms. Kitchings:

Please find enclosed find *Respondent/Appellant C. J. Gahagan's Motion for Extension of Time to Serve and File Initial Brief in Response to Appellant/Respondent's Brief* in the above matter for filing.

We would respectfully request a thirty-day extension of time to file the Response Brief due to the fact that I am on several dockets for trial in the coming weeks. This would be the first extension requested for these filings. If this extension were to be granted, the Response Brief would be due on June 12, 2023.

A check in the amount of \$50 with regard to this request is also being mailed to the Court today. Thank you for your kind consideration.

With kind regards, I am

Sincerely yours,

TURNER PADGET GRAHAM AND LANEY P.A.



David L. Moore Jr.

DLM/jsm

*Sent via e-mail and U.S. Mail*

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