

**RECEIVED**  
**Jun 12 2023**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Shannon M. Phillips, Master-in-Equity

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Appellate Case No. 2022-001649

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Gwendolyn Lockett, .....Appellant,

v.

Barnyard Flea Market of Greer, LLC and Jane Doe, Defendants,  
of which Barnyard Flea Market of Greer, LLC is.....Respondent.

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**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENT’S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

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TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT  
OF APPEALS:

Pursuant to Rule 240(a), SCACR, Respondent respectfully moves this  
Court for an Order granting it an extension of time in which to file and serve  
its Initial Brief and Designation of Matter.

Appellant’s Initial Brief and Designation of Matter were due to be filed  
and served May 12, 2023 and Respondent’s Initial Brief and Designation of

Matter are due June 12, 2023. However, Appellant's Initial Brief and Designation of Matter were not received by undersigned counsel until June 2, 2023. Since Appellant's Initial Brief and Designation of Matter were received ten (10) days before Respondent's deadline, undersigned counsel respectfully requests a thirty (30) day extension in order to file and serve Respondent's Initial Brief and Designation of Matter. With the extension, Respondent's new deadline would be July 12, 2023.

Respondent greatly appreciates the Court's time, attention, and assistance with regard to this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR RESPONDENT

**MOTION FOR EXTENSION OF  
TIME TO FILE RESPONDENT'S  
INITIAL BRIEF AND  
DESIGNATION OF MATTER**

June 5, 2023  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Shannon M. Phillips, Master-in-Equity

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Appellate Case No. 2022-001649

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Gwendolyn Lockett, .....Appellant,

v.

Barnyard Flea Market of Greer, LLC and Jane Doe, Defendants,  
of which Barnyard Flea Market of Greer, LLC is.....Respondent.

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**PROOF OF SERVICE**

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I hereby certify that I have caused to be served Respondent’s Motion for Extension of Time to File Respondent’s Initial Brief and Designation of Matter upon all parties, by electronic mail to all counsel of record on June 12, 2023, addressed to the following:

**COUNSEL SERVED:**

Robert Jamison Tinsley, Jr., Esquire  
Tinsley & Tinsley, P.C.  
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Respectfully submitted,  
COLLINS & LACY, P.C.

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ATTORNEYS FOR RESPONDENT

**PROOF OF SERVICE – MOTION  
FOR EXTENSION OF TIME TO  
FILE RESPONDENT’S INITIAL  
BRIEF AND DESIGNATION OF  
MATTER**

June 5, 2023  
Columbia, South Carolina