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May 23 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Master-in-Equity

Opinion No. 2024-UP-037
(S.C. Ct. App. filed January 31, 2014)

DAVID WILSON, INDIVIDUALLY AND DERIVATIVELY ON BEHALF OF CAROLINA
CUSTOM CONVERTING, LLC,.....Plaintiff,

vs.

JOHN GANDIS, ANDREA COMEAU-SHIRLEY, ZOI FILMS, LLC, AND CAROLINA
CUSTOM CONVERTING, LLC,.....Defendants,

vs.

CAROLINA CUSTOM CONVERTING, LLC,
.....Counterclaim Plaintiff,

vs.

DAVID WILSON, STEVE NORVELL, NEOLOGIC DISTRIBUTION, INC. AND FRESH
WATER SYSTEMS, INC.,Counterclaim Defendants

OF WHICH CAROLINA CUSTOM CONVERTING, LLC, JOHN GANDIS, AND ANDREA
COMEAU-SHIRLEY are the.....Appellants

and

DAVID WILSON is the.....Respondent.

MOTION FOR EXTENSION OF TIME TO FILE Reply to Petition FOR WRIT OF CERTIORARI

David Wilson (“Respondent”) moves the Court to grant a ten (10) day extension to the deadline to file a reply to petition for writ of certiorari. Petitioners filed and served the petition for a writ of certiorari on May 13, 2024. Respondent’s counsel will be taking vacation and needs additional time to reply and accordingly, is seeking a ten (10) day extension, making the deadline for filing and serving the reply on June 24, 2024. Counsel for Respondent has consulted with counsel for Petitioner, and Petitioner does not oppose the motion.

Respectfully submitted,

s/W. Andrew Arnold
W. ANDREW ARNOLD
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Law Office of W. Andrew Arnold, P.C.
245 E. Broad St., Suite A
Greenville, SC 29601
(864) 242-4800
aarnold@aalawfirm.com
Attorney for Respondent David Wilson

Dated May 23, 2024

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PROOF OF SERVICE

I certify that I have served the Respondent David Wilson's MOTION FOR
EXTENSION OF TIME TO FILE REPLY TO PETITION FOR WRIT OF CERTIORARI
on counsel for Appellant on May 23, 2024, via email at the following addresses:

Burl F. Williams, Esq.

burl@burlfwilliams.com

D. Randall Moody, Esq.

randy.moody@jacksonlewis.com

s/W. Andrew Arnold

W. ANDREW ARNOLD (SC Bar No.65311)

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ATTORNEY FOR DAVID WILSON



W. Andrew Arnold
Attorney
Admitted in SC

May 23, 2024

SENT BY EMAIL AND US MAIL

The Honorable Patricia A. Howard
Clerk of Court
Supreme Court of South Carolina
P.O. Box 11330
Columbia, South Carolina 29211
supctfilings@sccourts.org

Re: *David Wilson et al. v. John Gandis, et al. 2012-CP-23-02887*
Opinion No.: 2024-UP-037 (S.C. Ct. App. Filed January 31, 2014)

Dear Ms. Howard:

Please find enclosed Respondent's Motion for Extension of Time to File Reply to Petition for Writ of Certiorari. A check for the filing fee in the amount of \$50 has been placed in the mail.

Thank you.

Sincerely,

s/W. Andrew Arnold

Law Office of W. Andrew Arnold, PA

Enclosure

cc: The Honorable Jenny Kitchings (via email: ctappfilings@sccourts.org)
Burl F. Williams, Esq. (via email: burl@burlfwilliams.com)
D. Randle Moody, Esq. (via email: randy.moody@jacksonlewis.com)
Laura Ashley Ahrens, Esq. (via email: laura.ahrens@jacksonlewis.com)