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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2011-CP-07-00013

Maureen T. Coffey, Respondent,

v.

Community Services Associates, Inc. and George F. Appellants.
Breed, Jr.,.....

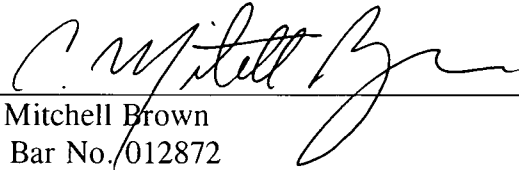
**RESPONDENT'S SECOND MOTION FOR EXTENSION OF TIME TO
FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO
BE INCLUDED IN THE RECORD ON APPEAL AND MOTION FOR
EXTENSION OF PAGE LIMITS - CONSENT GRANTED**

Respondent Maureen Coffey hereby files a request for an additional thirty (30) days to file her initial brief and designation of matter to be included in the Record on Appeal. Currently, Respondent's initial brief and designation are due on September 25, 2013. With the additional thirty (30) day extension of time, Respondent's initial brief and designation of matter will be due October 25, 2013.

Undersigned counsel for Respondents requests the additional time due to other existing personal and work obligations. Counsel for both Appellants consent to these extension requests. (See Exhibit A). Respondent requests that the current deadline be held in abeyance until the Court rules upon this request.

In addition, due to the number of issues involved in this appeal, Respondent requests the right to expand the pages for its briefs to 60 pages. Respondent may in the end not need all of these additional pages. Counsel for Appellants both consent to this request as well.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
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Attorneys for Respondent Maureen T. Coffey

Columbia, South Carolina

9/12, 2013

Exhibit A

Lisa Whitehurst

From: Mitch Brown
Sent: Tuesday, September 10, 2013 11:13 AM
To: Lisa Whitehurst
Subject: FW: Coffey briefing

Exhibit A, part 2

-----Original Message-----

From: Weston Adams [<mailto:wadams@mgclaw.com>]
Sent: Monday, September 09, 2013 5:18 PM
To: Mark S. Barrow
Cc: Mitch Brown; Helen Hiser
Subject: Re: Coffey briefing

I consent as well
WA

On Sep 9, 2013, at 4:58 PM, "Mark S. Barrow"
<MSB@swblaw.com<<mailto:MSB@swblaw.com>>> wrote:

I consent.

From: Mitch Brown [<mailto:mitch.brown@nelsonmullins.com>]
Sent: Monday, September 09, 2013 4:54 PM
To: wadams@mgclaw.com<<mailto:wadams@mgclaw.com>>; Mark S. Barrow
Subject: Coffey briefing

Hi Mark and Weston:

Now that you guys have won my motion to strike and are making me write large briefs on all issues, I have two questions: 1) will you agree to an additional 10 pages for each of my briefs (I may not need that much); and 2) will you agree to a second extension request for me for 30 more days? I have a very large discovery deadline to make in a case, 3 Court of Appeals briefs due in about a week, and also I have to go out of town to Charlotte and to Washington during the current time frame. I would appreciate it and of course return the favor for your reply briefs if you need that.

Mitch

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure.

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PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Respondent's Second Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal and Motion for Extension of Page Limits - Consent Granted

Counsel Served:

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Lisa P. Whitehurst
Administrative Assistant

September 12, 2013