

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

70634

APPEAL FROM AIKEN COUNTY
COURT OF COMMON PLEAS
THE HONORABLE DOYET A. EARLY, III CIRCUIT COURT JUDGE
THE HONORABLE CLIFTON NEWMAN, CIRCUIT COURT JUDGE

Civil Action No.: 2011-CP-02-00868

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DEC 11 2013

Paige Weeks Johnson, as Personal Representative
of the Estate of Christie Lane Valenzuela,

SC Court of Appeals

RESPONDENT,

versus

Sam English Grading, Inc.,

APPELLANT.

-and-

Civil Action No.: 2012-CP-02-01225

Michael Lee Valenzuela,

PLAINTIFF,

versus

Sam English Grading, Inc.,
Chris W. English, and Jeffrey
Dwayne Lewis

DEFENDANTS.

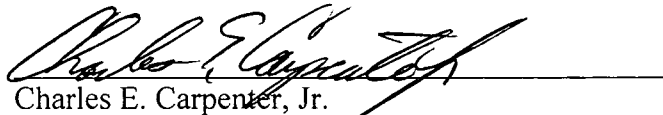
Motion for Extension of Time to File the Initial Appellant's Reply Brief

The Appellant, Sam English Grading, Inc., requests an extension of time in which to file an Initial Reply Brief. This is a first request to file an Initial Reply Brief. Counsel

returned from a two week family trip on the day after the Respondents Initial Respondents Brief was mailed but was ill from something acquired on a visit with a grandchild and has not been able to begin until now. In addition to the backlog of work from a two week absence followed by an illness, the holidays are arriving. Counsel has spoken with Robert Hill, Counsel for the Respondent, and he agrees to an extension to file the Appellants Initial Reply Brief until January 6, 2014.

Your Appellant therefore requests an extension to file its Initial Reply Brief until January 6, 2014.

A \$25.00 filing fee is enclosed with this Motion.



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**ATTORNEYS FOR APPELLANT,
SAM ENGLISH GRADING, INC.**

December 10, 2013.

Other Counsel of Record:

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Lexington, SC 29072

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**ATTORNEYS FOR RESPONDENTS,
PAIGE WEEKS JOHNSON,
AS PERSONAL REPRESENTATIVE
OF THE ESTATE OF CHRISTIE LANE VALENZUELA**

-and-

J. Paul Detrick

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Hampton, SC 29924

(803) 943-2111

ATTORNEY FOR PLAINTIFF MICHAEL LEE VALENZUELA

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Carpenter Appeals and Trial Support, LLC, attorneys for Appellant, Sam English Grading, Inc., do hereby certify that I have this date served the foregoing Motion for Extension of Time to File an Initial Reply Brief, dated December 10, 2013, by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the parties indicated below:

J. Paul Detrick
PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.
Post Office Box 457
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-and-

L. Lisa McPherson
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Allison Estrada
Allison Estrada, Paralegal to Charles
E. Carpenter, Jr.

Dated: December 10, 2013