

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Judge

C.A. No. 2012-CP-23-1735

Hidria USA, Inc.Appellant

v.

Delo, d.d., d/b/a *Slovenske Novice*Respondent.

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APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE FEB 21 2014
APPELLANT'S FINAL BRIEF AND MOTION FOR SUBSTITUTION OF
COUNSEL **SC Court of Appeals**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the Appellant, Hidria USA, Inc., herewith moves the Court for an order granting it a thirty (30) day extension of time in which to file Appellant's Final Brief. Appellant's Final Brief was due on or before November 13, 2013. With a thirty (30) day extension, Appellant's Initial Brief and Designation of Matter would be due on or before March 12, 2014.

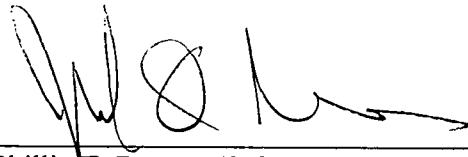
The extension requested herein is necessitated by confusion created by the departure of Jennifer Eubanks, counsel of record, from the firm of Gallivan, White & Boyd, P.A. Counsel for Appellants improperly assumed that Ms. Eubanks had prepared,

filed, and served the Final Brief upon her departure. Counsel for Appellants did not realize that the Final Brief had not been served until it received notification from the Court on February 10, 2014. In light of the foregoing, the Appellant, Hidria USA, Inc., respectfully requests a thirty (30) day extension of time until and including March 12, 2014, to have sufficient time to prepare and file a Final Brief. Counsel for the Respondent has consented to this request.

Further, the Appellant, Hidria USA, Inc., hereby moves the Court, for an order allowing the removal of Jennifer D. Eubanks as counsel for the appellant as she is no longer employed with the firm Gallivan, White & Boyd, P.A, and is no longer involved in this action. The appellant further requests that Nicholas A. Farr of the firm Gallivan, White & Boyd, P.A, be substituted as counsel in place of Ms. Eubanks. As such, the Appellant requests that Jennifer D. Eubanks, previously of the firm Gallivan, White & Boyd, P.A., be permitted to withdraw as counsel in this case and that Nicholas A. Farr of the firm Gallivan, White & Boyd, P.A., be substituted as counsel in her place.

Finally, the Appellant also respectfully requests that this Court hold the briefing time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted,



Greenville, SC

February 17, 2014

Phillip E. Reeves (S.C. Bar No. 4672)
Nicholas A. Farr (S.C. Bar No. 78769)
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Attorneys for Appellant, Hidria USA, Inc.

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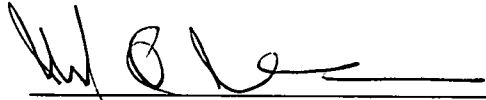
Delo, d.d., d/b/a *Slovenske Novice*Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that he is the attorney for the Appellant, Hidria USA, Inc., in the above-referenced matter and that he served the Appellant's Motion for Extension of Time to File Appellant's Final Brief and Motion for Substitution of Counsel upon the attorneys for the Respondent, by placing copies in the U.S. States Mail on February 17, 2014, addressed as follows:

Mr. Wallace K. Lightsey
Ms. Meliah Bowers Jefferson
Wyche, P.A.
44 East Camperdown Way
Greenville, SC 29601-3512

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FEB 21 2014
SC Court of Appeals



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February 17, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Hidria USA, Inc. vs. Delo, d.d., d/b/a *Slovenske Novice*
C.A. No.: 2012-CP-23-1735
Appellate Case No.: 2013-000690

Dear Ms. Kitchings:

Enclosed for filing please find the originals and six copies each of Motion for Extension of Time to File Appellant's Brief and Motion for Substitution of Counsel and Proof of Service in the above-referenced matter. Also enclosed is our firm check in the amount of \$25.00 for the filing fee for this motion. I would appreciate your filing the original documents, clocking the copies thereof and returning them to me in the enclosed envelope. By copy of this letter, I am serving counsel of record with a copy of these documents.

Thank you for your assistance in this matter. Should you have any questions, or need any additional information concerning this case, please do not hesitate to give me a call.

Sincerely yours,

GALLIVAN, WHITE & BOYD, P.A.

Phillip E. Reeves

PER/sea
Enclosures
cc: Mr. Wallace K. Lightsey
Ms. Meliah Bowers Jefferson

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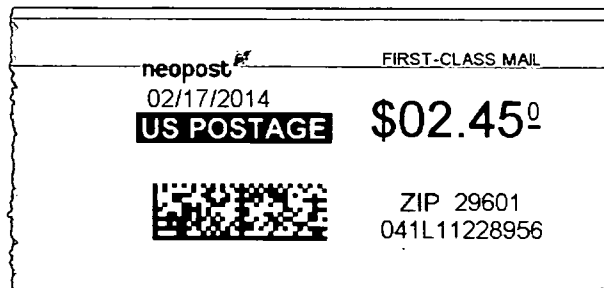
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ATTORNEYS AT LAW

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Greenville, South Carolina 29601

The Honorable Jenny Abbott Kitchings

Clerk of Court

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