

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

**RECEIVED**

APR 01 2014

**SC Court of Appeals**

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Case No. 2013-CP-21-2722  
Appellate Case No. 2013-002722

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Omega Construction, Inc. .... Respondent,

v.

Crailar, Inc., d/b/a Crailar Technologies, Inc., f/k/a  
Naturally Advanced Technologies US, Inc. .... Appellant,

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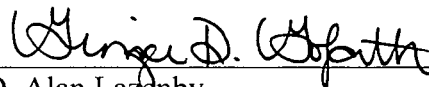
**RESPONDENT'S MOTION TO EXTEND TIME TO FILE INITIAL BRIEF &  
DESIGNATION OF MATTER**

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Respondent Omega Construction, Inc. moves pursuant to Rule 240, SCACR for an order extending his time to file and serve the Initial Brief and Designation of Matter for thirty (30) days, making the Initial Brief and Designation of Matter due on or before April 8, 2014. Respondent requests this extension in order to provide counsel sufficient time to adequately research and prepare these pleadings. Respondent submits that this motion is not interposed for delay, and will not prejudice Appellants. Respondent also

requests that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

Respectfully submitted,



D. Alan Lazenby  
Ginger D. Goforth

LAZENBY LAW FIRM  
PO Box 6099  
Spartanburg, SC 29304  
(864) 804-5050  
Attorneys for Respondent

March 28, 2014

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Case No. 2013-CP-21-2722  
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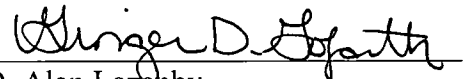
Omega Construction, Inc. .... Respondent,

v.

Crailar, Inc., d/b/a Crailar Technologies, Inc., f/k/a  
Naturally Advanced Technologies US, Inc. .... Appellant,

**PROOF OF SERVICE**

I, the undersigned, hereby certify the Motion to Extend Time to File Initial Brief and Designation of Matter in the above referenced matter was mailed, postage prepaid, to Appellant's Attorney, Lawrence Hershon, by sending to Parker Poe Adams & Bernstein, 201 Main Street, Suite 1450, Columbia, SC 29201, on March 28, 2014.



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March 28, 2014

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SC Court of Appeals

# LAZENBY LAW FIRM, LLC

ATTORNEYS AT LAW

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March 28, 2014

The Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk  
PO Box 11629  
Columbia, SC 29211

**Re: *Omega Construction, Inc. v. Crailar, Inc., d/b/a Crailar Technologies, Inc.,  
f/k/a Naturally Advanced Technologies US, Inc.***  
**In the Court of Common Pleas for Florence County**  
**C.A. No: 2013-CP-21-2722**  
**Appellate Case No. 2013-002722**

Dear Ms. Kitchings:

I enclose herewith an original and one copy of a Motion to Extend Time to File Initial Brief and Designation of Matter on behalf of Respondent. Please file the original and send a clocked copy back to me in the envelope I have enclosed for your convenience. I appreciate your assistance in this regard.

Sincerely,



Ginger D. Goforth  
[ginger@lazenbylawfirm.com](mailto:ginger@lazenbylawfirm.com)

GDG: jeh  
Enclosures  
cc: Lawrence Hershon, Esq. (via US Mail & Email)

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SC Court of Appeals

LAZENBY LAW FIRM  
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**SC Court of Appeals**



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CLERK OF COURT FOR COURT OF APPEALS  
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