

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

71805

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
J.C. Nicholson, Jr., Circuit Court Judge

RECEIVED

APR 04 2014

SC Court of Appeals

Case No. 2009-CP-10-06529

Amber Johnson.....Respondent,

v.

Stanley E. Alexander, Mario S. Inglese
and Mario S. Inglese, P.C., Of Whom
Stanley E. Alexander is the.....Appellant,

Mario S. Inglese and Mario S. Inglese, P.C.Third Party Plaintiffs,

v.

Charles Feeley.....Third Party Defendant.

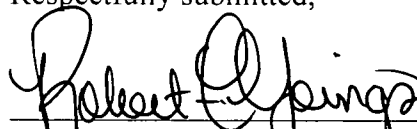
**APPELLANT’S MOTION FOR EXTENSION TO FILE RETURN
TO RESPONDENT’S PETITION FOR REHEARING**

Appellant Stanley E. Alexander (“Alexander”) hereby moves for an additional fifteen (15) days to file his Return to Respondent’s Petition for Rehearing. Respondent’s Petition for Rehearing and Certificate of Service is dated April 2, 2014. Alexander received this petition in the United States Mail on April 4, 2014. Alexander understands his Return is due on or before April 14, 2014. The undersigned counsel is leaving for a family vacation to Italy on the afternoon of April 4, 2014, and the Return is currently due on the date counsel returns from this vacation. Accordingly, Alexander respectfully requests an extension of fifteen (15) days from

the date from April 14, 2014 to submit a Return to Respondent's Petition for Rehearing. The deadline would be extended to April 29, 2014. Counsel for Respondent does not object to the relief requested herein.

Respectfully submitted,

By:



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ATTORNEYS FOR APPELLANT
STANLEY E. ALEXANDER

Columbia, South Carolina
April 4, 2014

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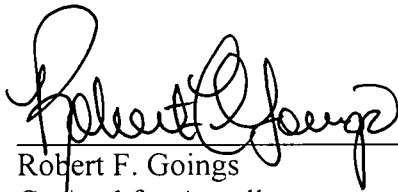
Charles Feeley.....Third Party Defendant.

PROOF OF SERVICE

I certify that I have served Appellant's Motion For Extension To File Return to Petition for Rehearing by mailing a copy of same, via United States Mail, on April 4, 2014 to the following:

Mary Leigh Arnold, Esq.
Mary Leigh Arnold, P.A.
749 Johnnie Dodds Blvd., Suite B
Mount Pleasant, SC 29464
Attorney for Respondent

Justin Kahn, Esq.
Wes B. Allison, Esq.
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Attorney for Respondent


Robert F. Goings
Counsel for Appellant



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April 4, 2014

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Amber Johnson v. Stanley Alexander
Case No.: 2009-CP-10-06529

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Appellant's Motion for Extension to File Return to Respondent's Petition for Rehearing along with Proof of Service and a check for \$25.00 representing payment for the applicable filing fee. Please file the original and return the filed-stamped copy to me via my courier.

By copy of this letter I am serving these documents on all counsel. Thank you for your assistance and please feel free to contact me should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Goings", written over a horizontal line.

Robert F. Goings

cc: Justin S. Kahn, Esq.
Mary Leigh Arnold, Esq.
Joel W. Collins, Jr., Esq.