

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 Court Judge

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Case Nos.: 2011-CP-23-4773  
2011-CP-23-6290  
Appellate Docket No.: 2013-001714

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71946

K&S Food Services, Inc. d/b/a Hailee's Bar and Grill ..... Appellant,

v.

City of Mauldin and Mauldin City Council, John Gardner,  
Brian Turner, and Callista, LLC,

Defendants,

Of whom City of Mauldin and Mauldin City Council,  
John Gardner and Brian Turner are the .....

**RECEIVED**

APR 21 2014

**SC Court of Appeals**

Respondents.

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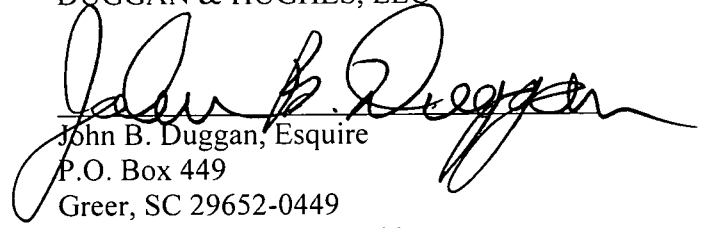
MOTION FOR EXTENSION  
OF TIME TO FILE  
RESPONDENT'S BRIEF

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Counsel for the Respondent hereby moves for an extension of time until May 21, 2014 in which to serve and file the Respondent's Brief in the present case. This request is based upon counsel's schedule including hearings, deadlines for Briefs due in other cases, and recent illness.

Respectfully submitted,

DUGGAN & HUGHES, LLC



John B. Duggan, Esquire  
P.O. Box 449  
Greer, SC 29652-0449  
Telephone: (864) 334-2500  
Facsimile: (864) 879-0149

April 16, 2014.

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CERTIFICATE OF SERVICE

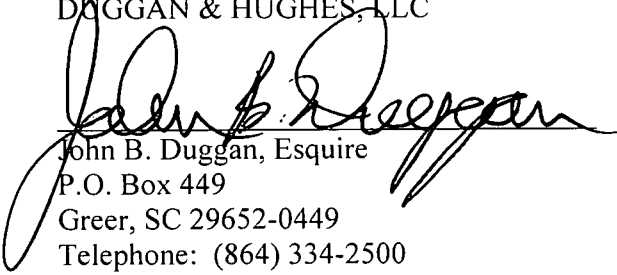
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This is to certify that I did on this date, serve a copy of the **Motion for Extension of Time to File Respondent's Brief and Respondents' Designation of Matters to be Included in the Record on Appeal** in regard to the above-referenced matter upon the Appellant, by depositing same in the United States mail with postage prepaid and affixed thereto, addressed as follows:

Robert C. Childs, III  
Attorney at Law  
2100 Poinsett Hwy, Suite E  
Greenville, SC 29609

Respectfully submitted,

DUGGAN & HUGHES, LLC

  
John B. Duggan, Esquire  
P.O. Box 449  
Greer, SC 29652-0449  
Telephone: (864) 334-2500  
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April 16, 2014.

**DUGGAN & HUGHES, LLC**  
ATTORNEYS AND COUNSELORS AT LAW

John B. Duggan  
Daniel R. Hughes

457-B Pennsylvania Avenue  
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Facsimile: (864) 879-0149

Mailing Address  
Post Office Box 449  
Greer, S.C. 29652

April 16, 2014

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

RE: K&S Food Services, Inc. d/b/a Hailee's Bar and Grill vs. City of Mauldin  
and Mauldin City Council, John Gardner, Brian Turner, and Callista, LLC  
(of whom City of Mauldin and Mauldin City Council, John Gardner and  
Brian Turner are the Respondents)  
C.A. No.: 2011-CP-23-6290/2011-CP-23-4773  
Appellate Docket No.: 2013-001714

Dear Ms. Kitchings:

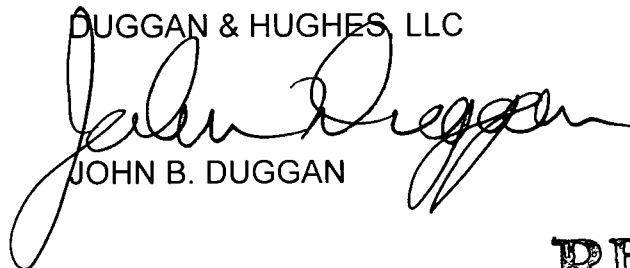
Enclosed please find the original and one copy of the Motion for Extension of Time to File Respondent's Brief, Respondents' Designation of Matters to be Included in the Record on Appeal, and Certificate of Service in regard to the above-referenced matter. I have also included this firm's check #002068 made payable to South Carolina Court of Appeals to cover your fee for filing the Motion. Please file these documents with the Court and return our clocked copies to me in the self-addressed, postage paid envelope provided.

Also, please be advised that I have spoken with opposing counsel who has consented to my request for an extension of time.

Furthermore, by copy of this letter I am serving same upon opposing counsel.

Sincerely,

DUGGAN & HUGHES, LLC



JOHN B. DUGGAN

JBD/seg  
Enclosure

Cc w/encl:  
Robert C. Childs, III, Esquire

**RECEIVED**

APR 21 2014

**SC Court of Appeals**