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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 25 2014

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Master in Equity

Case No.: 2010-CP-32-0460

David R. Gooldy, Respondent,

vs.

The Storage Center – Platt Springs, LLC, Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL
BRIEF AND DESIGNATION OF MATTER**


Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, the Appellant The Storage Center – Platt Springs, LLC moves this Court for an order granting an extension of thirty (30) days for the Appellant to file and serve its initial brief and designation of matter in the above-captioned appeal. This request is being made due to counsel's present workload and other professional commitments. This is the Appellant's first request for an extension of time.

Appellant's initial brief and designation of matter are currently due on Friday, May 9, 2014. If the motion is granted, Appellant's initial brief and designation of matter will be due on Monday, June 9, 2014.

LSX
5-9-14
6-9-14

Counsel for the Appellant has consulted with counsel for Respondent, and he has consented to this thirty day extension. A copy of counsels' email exchange, confirming the extension, is attached hereto as **Exhibit A**.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: _____

Robert E. Stepp
rstepp@sowellgray.com
Bess J. DuRant
bdurant@sowellgray.com
1310 Gadsden Street
Post Office Box 11449
Columbia, South Carolina 29211
Tel No.: (803) 929-1400

*Attorneys for Appellant, The Storage Center –
Platt Springs, LLC*

April 25, 2014

Other Counsel of Record:

James Randall Davis Esquire
Randy@oldcourthouse.com
Nicholson, Davis, Frawley, Anderson and Ayer, LLC
140 East Main Street
Lexington, South Carolina 29071
Tel No...: (803) 359-2512

Attorney for Respondent, David R. Gooldy

EXHIBIT A

Oken, Melissa T.

From: DuRant, Bess
Sent: Friday, April 25, 2014 10:44 AM
To: Oken, Melissa T.
Subject: FW: Goody v. The Storage Center

From: Randy Davis [mailto:Randy@oldcourthouse.com]
Sent: Friday, April 25, 2014 10:39 AM
To: DuRant, Bess
Subject: RE: Goody v. The Storage Center

I consent to a 30 day extension to serve and file Appellant's brief and designation of matter in the Goody case. James Randall Davis, Esquire

From: DuRant, Bess [mailto:bdurant@sowellgray.com]
Sent: Friday, April 25, 2014 10:16 AM
To: Randy Davis
Cc: Oken, Melissa T.
Subject: Goody v. The Storage Center

Randy,

Thank you kindly for consenting to a 30 day extension for us to serve and file our initial brief and designation of matter in the Goody case. If you'll please confirm this extension, we'll go ahead and file our motion for extension with the court of appeals, noting your consent.

Have a nice and relaxing weekend.

Best,
Bess



Bess J. DuRant v-card
Attorney

803.231.7832
www.sowellgray.com



Supporting Green. Please print wisely.

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David R. Gooldy,

Respondent,

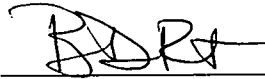
vs.

The Storage Center – Platt Springs, LLC,

Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter on Respondent David R. Gooldy by email (Randy@oldcourthouse.com) and by U.S. regular mail, postage pre-paid on April 25, 2014, addressed to his attorney of record, James Randall Davis, Esquire, Nicholson, Davis, Frawley, Anderson and Ayer, LLC, 140 East Main Street, P.O. Box 489, Lexington, South Carolina 29701.



Robert E. Stepp

rstepp@sowellgray.com

Bess J. DuRant

bdurant@sowellgray.com

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

1310 Gadsden Street

Post Office Box 11449

Columbia, South Carolina 29211

Tel No.: (803) 929-1400

Attorneys for Appellant

April 25, 2014

VIA HAND-DELIVERY

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Edgar A. Brown Building
1205 Pendleton Street
Columbia, South Carolina 29201

RE: David R. Gooldy v. The Storage Center – Platt Springs, LLC
SC Court of Appeals Case No.
Lexington County Case No. 2010-CP-32-0460
Our File No.: 6252/1501

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SC Court of Appeals

Dear Ms. Kitchings:

Pursuant to Rule 240, SCACR, enclosed please find the original and seven copies of a Motion for Extension of Time in the above-referenced matter along with this Firm's check in the amount of Twenty-Five and 00/100 Dollars (\$25.00) representative of the filing fee. I would appreciate your filing as appropriate and returning a clocked-in copy via our courier.

By copy of this letter and as evidenced by the Proof of Service, I am serving the Respondent, David R. Gooldy, with a copy of the same.

Sincerely,



Bess J. DuRant

Enclosures

cc: James Randall Davis, Esquire