

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

71947

Charles B. Simmons, Jr., Special Referee

Case No.: 2008-CP-39-56  
Appellate Case No. 2013-002154

Palmetto State Enterprises,  
LLC,

Respondent,

v.

Clegg Lamar Greene a/k/a  
Lamar Greene, Juleene  
Greene, a/k/a Julie Greene,  
J&P Enterprises of the  
Carolinas, Inc. and Gaston  
Engineering, Inc.

Defendants,

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APR 21 2014

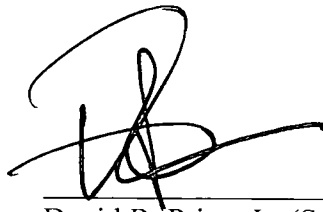
SC Court of Appeals

**MOTION FOR EXTENSION OF TIME**

This Motion is based on Respondent's discovery that the incorrect deposition of Ronald E. West was included in the Record on Appeal. Respondent therefore moves for an extension of time to file its Final Brief which was due April 21, 2014, until twenty (20) days after service of a corrected or supplemental Record on Appeal containing the de bene esse deposition of Ronald E. West, which was submitted to the trial court as Plaintiff's Exhibit 12.

DPO

1st



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David R. Price, Jr. (S.C. Bar # 75140)

**DAVID R. PRICE, JR., P.A.**

318 West Stone Avenue (29609)

Post Office Box 2446

Greenville, South Carolina 29602-2446

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David@GreenvilleLegal.com

Attorney for Respondent

Greenville, South Carolina

Date: April 16, 2014

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In The Court of Appeals

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Case No. 2013-002154

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Palmetto State Enterprises,  
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Clegg Lamar Greene a/k/a  
Lamar Greene, Juleene  
Greene, a/k/a Julie Greene,  
J & P Enterprises of the  
Carolinas, Inc., and Gaston  
Engineering, Inc.,

Appellant.

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**PROOF OF SERVICE**

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I certify that I have served Respondent's Motion for Extension of Time to file Final Brief, on Scott F. Talley Appellant's Counsel of Record and Dan Hunt, the Personal Representative of the Estate of Lamar Greene, by depositing a copy of it in the United States Mail with postage prepaid on April 16, 2014, as well as by via facsimile to all Counsel of Record.

Counsel of Record:  
Scott F. Talley, Esq.  
Talley Law Firm, P.A.  
2500 Winchester Place, Ste. 100  
Spartanburg, SC 29301  
Fax No.: 864-595-2969  
*Attorneys for J & P Enterprises of  
The Carolinas, Inc.*

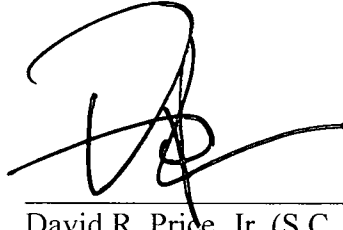
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**SC Court of Appeals**

Dan Hunt, Esq.  
502 North A Street  
Easley, SC 29640  
Fax No.: (864) 859-2434  
*Personal Representative of  
the Estate of Lamar Greene*

South Carolina Court Administration  
1015 Sumter Street, Suite 200  
Columbia, South Carolina 29201



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David R. Price, Jr. (S.C. Bar # 75140)  
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David@GreenvilleLegal.com  
Attorney for the Respondent

Greenville, South Carolina  
Date: April 16, 2014



**DAVID R. PRICE, JR., P.A.**

ATTORNEY AT LAW

April 16, 2014

The Honorable Tanya A. Gee  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

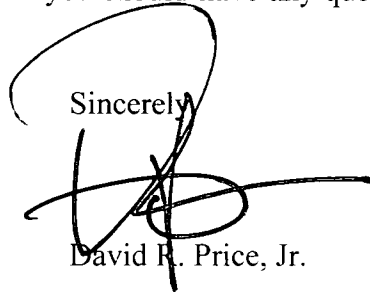
**RE: Palmetto State Enterprises, LLC v. Clegg Lamar Greene a/k/a Lamar  
Greene, Juleene Greene, J&P Enterprises of the Carolinas, Inc. and  
Gaston Engineering, Inc.  
Appellate Case No.: 2013-002154**

Dear Ms. Gee:

Enclosed you will find an original and six (6) copies of a *Motion to Request Extension of Time* to file and serve Respondent's Final Brief in connection with the above referenced appeal, along with an original and copies of a *Proof of Service*. Also enclosed is our check in the amount of **\$25.00** for the filing fee of same.

Please contact our office if you should have any questions or need further information.

Sincerely,



David R. Price, Jr.

DRP/mla

Enclosures

cc: Scott Franklin Talley, Esq.  
2500 Winchester Place  
Suite 100  
Spartanburg, SC 29301  
*Attorneys for Appellant  
J&P Enterprises of the  
Carolinas, Inc.*

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**SC Court of Appeals**

Dan Hunt, Esq.  
502 North A Street  
Easley, SC 29640  
*P.R. for Estate of Lamar Greene*

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