

**STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

**RECEIVED**

MAY 30 2014

**SC Court of Appeals**

**Appeal from Charleston County  
Court of Common Pleas  
Hon. J.C. Nicholson, Jr., Circuit Court Judge**

**Case No. 2009-CP-10-6529  
Op. No. (5208)**

Amber Johnson.....Respondent,

v.

Stanley E. Alexander, Mario S. Inglese and Mario S. Inglese, P.C.,  
of whom Stanley E. Alexander is the .....Appellant.

v.

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

v.

Charles Feeley.....Third Party Defendant.

**RESPONDENT'S CONSENT MOTION FOR EXTENSION TO FILE PETITION  
FOR WRIT OF CERTIORARI AND APPENDIX**

WHEREAS counsel for Respondent needs an extension of time to file her Petition for Writ of Certiorari and Appendix in this matter due to counsel having a trial and preparation for that trial and other conflicts; and

WHEREAS counsel for Respondent has received consent from Robert Goings, Esq., counsel for Appellant, for an extension providing counsel for Respondent to have until July 16, 2014 to file her Petition for Writ of Certiorari;

Counsel for the Respondent hereby moves for an extension to allow Respondent to file her Petition for Writ of Certiorari and accompanying Appendix no later than July 16, 2014.

Justin S. Kahn



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**Attorneys for Respondent  
Amber Johnson**

Charleston, South Carolina  
May 29, 2014

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v.

Charles Feeley.....Third Party Defendant.

PROOF OF SERVICE

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ATTORNEYS FOR RESPONDENT  
AMBER JOHNSON

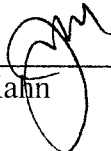
I, Justin S. Kahn, do hereby affirm that on May 29, 2014, I served one copy of the Respondent's Consent Motion for Extension to File Petition for Writ of Certiorari and Appendix on the following named individuals by placing a copy in the United States Mail, first class, postage prepaid addressed to the following:

Joel W. Collins, Jr.  
**Collins & Lacy, P.C.**  
Post Office Box 12487  
Columbia, SC 29211

Robert F. Goings  
**Goings Law Firm, LLC**  
914 Richland St., Ste. A-101  
Columbia, SC 29201

**Attorneys for Appellant**  
**Stanley E. Alexander**

I further affirm that on this same date, I placed one copy of the Respondent's Consent Motion for Extension to File Petition for Writ of Certiorari and Appendix in the mail for filing with the Clerk of Court of the South Carolina Court of Appeals.

  
\_\_\_\_\_  
Justin S. Kahn

Charleston, South Carolina  
May 29, 2014

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WES B. ALLISON**

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May 29, 2014

Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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

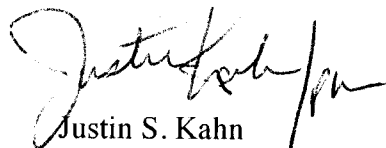
**Appellate Case No.: 2011-196007**

Dear Ms. Kitchings:

Enclosed are two copies of Respondent's Consent Motion for Extension to File Petition for Writ of Certiorari and Appendix with proof of Service in this matter, which is being mailed for filing today to the South Carolina Supreme Court. Please file one copy, mark the extra copy filed and return it to us in the enclosed, postage-prepaid envelope.

Thank you very much.

Sincerely,

  
Justin S. Kahn

JSK/pm

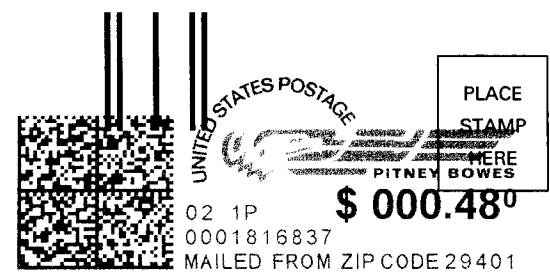
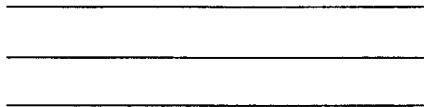
Encl.

cc: Joel W. Collins, Esq. (via U.S. Mail, w/encl.)  
Robert F. Goings, Esq. (via U.S. Mail, w/encl.)  
Mary Leigh Arnold, Esq. (via email, w/encl.)

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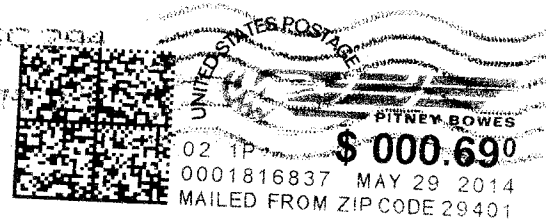
*JK*



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CHARLESTON SC 294

30 MAY 2014



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