

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

M2234

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2012-CP-17-00295

RECEIVED
MAY 19 2014
SC Court of Appeals

Ebony Bethea,

Appellant,

v.

Derrick Jones, John Doe, Individually and as
employee/agent of Citi Trends, Inc., Citi Trends, Inc.,
and Palmetto Properties, Inc., Defendants,

Of whom Citi Trends, Inc., and
Palmetto Properties, Inc. are

Respondents.

Appellate Case No. 2014-000332

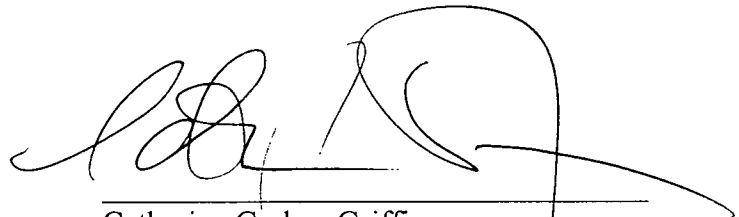
**MOTION FOR EXTENSION OF TIME TO FILE
AND SERVE INITIAL BRIEF,
DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL, AND PROOF OF SERVICE**

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Respondent Citi Trends, Inc., ("Citi Trends") hereby moves for an extension of time of thirty (30) days to serve and file its initial brief, the designation of matter to be included in the record on appeal, and the proof of service thereof on the appellant in the above-referenced case. To date, Respondent Citi Trends has not requested an extension of time. The appellant served her initial brief and designation of matter on the respondents

on April 28, 2014; therefore, the initial brief and the designation of matter to be included in the record on appeal of Respondent Citi Trends would be due on May 28, 2014. Respondent Citi Trends respectfully requests an extension of time until June 27, 2014. This extension of time is necessitated due to the schedule of the attorney for Respondent Citi Trends and the complexity of the issues to be addressed in the initial brief.

The attorney for Respondent Citi Trends has consulted with appellant's attorney who has consented to this request for an extension.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'C.G. Griffin', written over a horizontal line.

Catharine Garbee Griffin
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400 (29204)
Post Office Box 8057
Columbia, South Carolina 29202
(803) 799-9091
Attorneys for Respondent Citi Trends, Inc.

May 19, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2012-CP-17-00295

Ebony Bethea,

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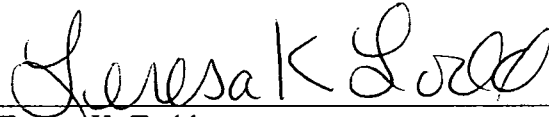
Appellate Case No. 2014-000332

CERTIFICATE OF SERVICE

I, Teresa K. Todd, Legal Assistant to Catharine Garbee Griffin, an employee of Baker, Ravenel & Bender, L.L.P., hereby certify that I have, on the date indicated below, served counsel below with Motion for Extension of time to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service, by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following address:

Akim A. Anastopoulos, Esquire
Eric M. Poulin, Esquire
Anastopoulos Law Firm, LLC
2850 Ashley Phosphate Road, Suite B
North Charleston, SC 29418

Robert W. Buffington, Esquire
Haynsworth Sinkler Boyd, PA
PO Box 340
Charleston, SC 29402-0340

A handwritten signature in cursive script, reading "Teresa K. Todd". The signature is written in black ink and is positioned above a horizontal line.

Teresa K. Todd

May 19, 2014



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

Catharine Garbee Griffin
Direct Dial 803.343.3863
cgriffin@brblegal.com

May 19, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Ebony Bethea, Appellant, v. Derrick Jones, John Doe, individually and as employee/agent of Citi Trends, Inc., Citi Trends, Inc., and Palmetto Properties, Inc., Defendants, of whom Citi Trends, Inc., and Palmetto Properties are Respondents
Appellate Case No. 2014-000332
Claim No. ENH3422
Our File No. 7746.1934

Dear Ms. Kitchings:

Enclosed herein please find Citi Trends' Motion for Extension of Time to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service in the above-referenced case. Please clock a copy and return via our courier. I have also included a check in the amount of \$25.00 as the filing fee.

By copy of this letter to the other attorneys in this case, I am serving them with a copy of the same.

If you have any questions concerning this letter, please feel free to call me.

Yours truly,

Catharine Garbee Griffin

CGG/tkt
Enclosures

Cc: Eric Poulin, Esquire
Robert W. Buffington, Esquire

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