

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

**APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas**

The Honorable Frank R. Addy, Jr.

Case No. 2014-000091

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JUN 09 2014
SC Court of Appeals

James Spencer, individually, and on behalf of the Estate of Doris Holt and on behalf of Southern Holdings, Inc.; and Irene Santacroce, Plaintiffs,

of whom James Spencer is the Appellant,

v.

John R. Rakowsky, Adrian L. Falgione, and the Law Offices of Adrian Falgione, LLC, Respondents,

of whom John R. Rakowsky and Adrian L. Falgione are the Respondents.

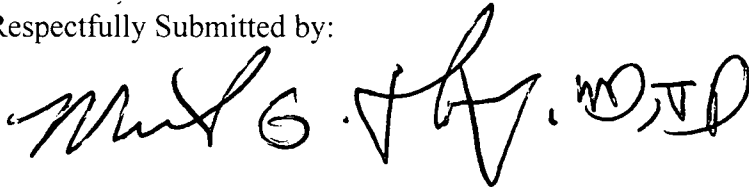
MOTION FOR EXTENSION OF TIME

The Estate of Doris C. Holt and Dan Green, by and through the undersigned counsel, respectfully request that This Honorable Court grant an extension of time for the filing of this Response to John R. Rakowsky and Adrian L. Falgione's Return to Motion of the Estate of Doris C. Holt and Shareholder Dan Green, the Former President of Southern Holdings, Inc. Black's Law Dictionary defines service as the actual date that one receives the papers. I was told, however, by the Clerk of Court, Ms. Monica Cassidy, Esq., that despite not belatedly receiving service just forty eight hours ago I would have to file this motion for relief because the applicable date is not when I receive service but the date the motion was dated by Respondent.

I will not argue with Respondent's unsavory tactic of causing me to be late by dating their Return to Motion May 30, 2014, and delaying mailing it, but humbly ask This Honorable Court to accept this Motion to File Late in the name of justice and equity.

On June 6, 2014

Respectfully Submitted by:

A handwritten signature in black ink, appearing to read "Michael G. Sribnick, M.D., J.D., LLC". The signature is written in a cursive, flowing style with some capital letters and initials.

Michael G. Sribnick, M.D., J.D., LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 6, 2014, the document described below, was (were) served on all parties of record in this case by mailing a copy, by US mail.

Documents served: **MOTION FOR EXTENSION OF TIME TO RESPOND IN OPPOSITION TO RESPONDENTS' RETURN**

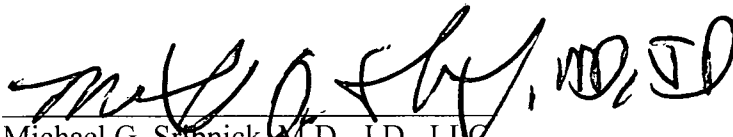
Parties Served:

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