

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Administrative Law Court

The Honorable Shirley C. Robinson, Administrative Law Judge

**RECEIVED**

JUN 20 2014

**SC Court of Appeals**

Appellate Case No. 2014-001170

South Carolina Department of Motor Vehicles . . . . . Appellant,

v.

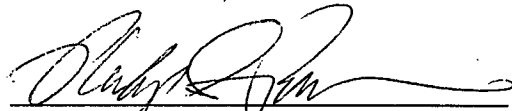
Russo Dumpster, Inc. . . . . Respondent.

**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, the Appellant South Carolina Department of Motor Vehicles (SCDMV) requests an extension of the deadline for filing the Initial Brief and Designation of Matter to be included in the Record on Appeal. The current deadline to file Appellant SCDMV's Initial Brief and Designation of Matter is June 30, 2014. Counsel for Appellant SCDMV was scheduled prior to the scheduling of this case to be in Oconee County participating in Salkehatchie Summer Service last week, and to be out of the country on a previously scheduled vacation in late June. Thus, very little time in June was available in which to file the Initial Brief and Designation of Matter, and a number of other matters have had to be attended to in order to accommodate the out of office time. Appellant SCDMV is therefore requesting an extension of time until August

1, 2014, in which to file its Initial Brief and Designation of Matter in this case. This is Appellant SCDMV's first request for an extension of this deadline. The Respondent Russo Dumpster has been notified of this request but has not indicated either objection or consent.

Respectfully submitted,



PHILIP S. PORTER, SC Bar # 4526  
Deputy General Counsel  
Philip.Porter@SCDMV.net  
FRANK L. VALENTA, JR., SC Bar # 5682  
General Counsel  
Val.Valenta@SCDMV.net  
LINDA ANNETTE GRICE, SC Bar # 2260  
Assistant General Counsel  
Linda.Grice@SCDMV.net  
South Carolina Department of Motor  
Vehicles  
10311 Wilson Boulevard  
Post Office Box 1498  
Blythewood, South Carolina 29016-0020  
Telephone: (803) 896-9900  
Facsimile: (803) 896-9901  
Counsel for the Appellant

June 18, 2014  
Blythewood, South Carolina

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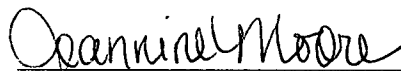
Russo Dumpster, Inc. .... Respondent.

**CERTIFICATE OF SERVICE**

Pursuant to SCACR Rule 224, I hereby certify that I have this date served Appellant SCDMV's Motion for Extension for Filing Initial Brief and Designation of Matter by depositing with the United States Postal Service, correct postage prepaid, to Respondent Russo Dumpster, Inc. at the addresses indicated below:

Russo Dumpster, Inc, *pro se*  
Attn: Mary Russo  
Post Office Box 1088  
Pineville, NC 28134

Russo Dumpster Services, Inc.  
Attn.: Mary Russo  
321 Wilson Dr.  
Ft. Mill, S.C. 29757-9029



Jeannine (Nina) Moore, Paralegal  
Office of General Counsel

June 18, 2014  
Blythewood, South Carolina

Nikki R. Haley  
Governor



Kevin A. Shwedo  
Director

*State of South Carolina*  
*Department of Motor Vehicles*

June 18, 2014

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

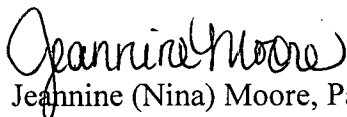
**RE: *South Carolina Department of Motor Vehicles v. Russo Dumpster, Inc.***  
**Appellate Case No: 2014-001170**

Dear Ms. Kitchings:

Enclosed for filing in the above-captioned action, please find the original and six (6) copies of Appellant South Carolina Department of Motor Vehicles' Motion for Extension. As evidenced by the attached Certificate of Service, I am serving the parties with a copy of same. Please file the original and return the extra copy to me with an affixed clerk's date of filing in the enclosed self-addressed stamped envelope.

Thank you for your cooperation in this matter.

In kind regards,



Jeannine (Nina) Moore, Paralegal  
Office of General Counsel

Enclosures

cc: Mary Russo, Russo Dumpster, Inc.

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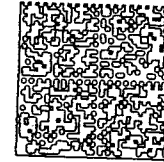


# South Carolina Department of Motor Vehicles

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Columbia, South Carolina 29216

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# South Carolina Department of Motor Vehicles

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Form 103

Forwarding Service Requested

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