

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

72522

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Jr., Circuit Court Judge

**RECEIVED**

JUN 17 2014

Case No. 2011-CP-42-4538  
Appellate Case No. 2014-000902

**SC Court of Appeals**

Tietex International Ltd, ..... Respondent,

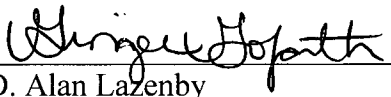
v.

Gary G. Harris, ..... Appellant,

**APPELLANT’S MOTION TO EXTEND TIME TO FILE INITIAL BRIEF &  
DESIGNATION OF MATTER**

Appellant Gary G. Harris moves pursuant to Rule 240, SCACR for an order extending his time to file and serve the Initial Brief and Designation of Matter for thirty (30) days. Appellant requests this extension because he recently obtained appellate counsel to research and prepare these pleadings. Appellant submits that this motion is not interposed for delay, and will not prejudice Respondents. Appellant also requests that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

Respectfully submitted,



D. Alan Lazenby  
Ginger D. Goforth

LAZENBY LAW FIRM  
PO Box 6099  
Spartanburg, SC 29304  
(864) 804-5050  
ATTORNEYS FOR APPELLANT

June 13, 2014

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Jr., Circuit Court Judge

**RECEIVED**

JUN 17 2014

Case No. 2011-CP-42-4538  
Appellate Case No. 2014-000902

**SC Court of Appeals**

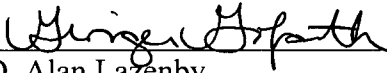
Tietex International Ltd, ..... Respondent,

v.

Gary G. Harris, ..... Appellant,

**PROOF OF SERVICE**

I, the undersigned, hereby certify the Motion to Extend Time to File Initial Brief and Designation of Matter in the above referenced matter was mailed, postage prepaid, to Respondent's Attorney, Fred Suggs, by sending to Ogletree Deakins Nash Smoak & Stewart PC, PO Box 2757, Greenville, SC 29602, on June 13, 2014.



D. Alan Lazenby  
Ginger D. Goforth  
Lazenby Law Firm, LLC  
PO Box 6099  
Spartanburg, SC 29304  
Phone: (864) 804-5050  
Fax: (864) 804-5051  
**Attorneys for Appellant**

June 13, 2014

# LAZENBY LAW FIRM, LLC

ATTORNEYS AT LAW

D. ALAN LAZENBY \*  
GINGER D. GOFORTH

\*ALSO LICENSED IN GA

POST OFFICE Box 6099 (29304)  
340 E. MAIN ST., SUITE 240  
SPARTANBURG, SC 29302  
PHONE: 864-804-5050  
FAX: 864-804-5051

June 13, 2014

The Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk  
PO Box 11629  
Columbia, SC 29211

**Re: *Harris v. Tietex International Ltd.***  
**In the Court of Common Pleas for Spartanburg County**  
**C.A. No: 2011-CP-42-4538**  

---

**Appellate C.A. No: 2014-00902**

Dear Ms. Kitchings:

I enclose herewith an original and one copy of a Motion to Extend Time to File Initial Brief and Designation of Matter on behalf of Appellant. Please file the original and send a clocked copy back to me in the envelope I have enclosed for your convenience. I appreciate your assistance in this regard.

Sincerely,



Ginger D. Goforth  
[ginger@lazenbylawfirm.com](mailto:ginger@lazenbylawfirm.com)

GDG: jeh  
Enclosures

cc: Fred Suggs, Esq. (via email & US Mail)  
Mr. Gary Harris (via email only)

**RECEIVED**

JUN 17 2014

**SC Court of Appeals**

LAZENBY LAW FIRM  
PO BOX 6099  
SPARTANBURG SC 29304-6099

\$0.980  
US POSTAGE  
FIRST CLASS  
FROM 29302  
JUN 14 2014  
stamps.com

06250008029815

Greenville P&DC 296

FRI 13 JUN 2014 PM

THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK OF COURT FOR COURT OF APPEALS  
PO BOX 11629  
COLUMBIA SC 29211-1629

**RECEIVED**

JUN 17 2014

**SC Court of Appeals**