

③

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2010-CP-23-1646

72776
&
72777
RECEIVED

JUL 09 2014

SC Court of Appeals

Kyle Pertuis, Respondent/Appellant,

v.

Front Roe Restaurants, Inc., Beachfront
Foods, Inc., Lake Point Restaurants, Inc.,
Mark Hammond and Larkin Hammond, Appellants/Respondents.

JOINT MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Appellants/Respondents Mark Hammond, Larkin Hammond, Front Roe Restaurants, Inc., Beachfront Foods, Inc., and Lake Point Restaurants, Inc. request a 15-day extension of the deadline for filing and serving their respective initial briefs and designations of matter to be included in the record on appeal in this case. The current deadline is July 9, 2014. This is the third extension request for this deadline.

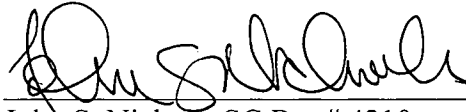
Previously, the Court ruled that no further extensions would be granted absent extraordinary circumstances. Appellants/Respondents offer the following as extraordinary circumstances that justify this request:

1. Counsel for Appellants/Respondents is currently serving as special counsel to the South Carolina House Ethics Committee, and those duties consumed inordinate amounts of time in recent weeks as to certain matters in which the Committee has an interest;
 2. Counsel for Appellants/Respondents is representing the Florence County Elections Commission in the Supreme Court's original jurisdiction and has a response due on Monday, July 14, 2014;
 3. Counsel for Appellants/Respondents is also counsel in an appeal in a child adoption matter before this Court that has been expedited for briefing (counsel received opponent's respondent's brief on Monday, July 7, 2014, and has requested the ability to file the reply brief on Monday, July 14) and oral argument set for July 23, 2014;
 4. Counsel for Appellants/Respondents is a member of the South Carolina Board of Law Examiners, which is currently preparing questions and answers for the July 2014 Bar Exam;
 5. Counsel for Appellants/Respondent is defense counsel in a matter before the Bamberg County Court of Common Pleas, which has set an unexpected expedited hearing on Motions for 10:00 a.m. on Thursday, July 10, 2014;
 6. Counsel for Appellants/Respondents is assisting three (3) lawyers regarding complaints before the Office of Disciplinary Counsel and has been preparing materials to file responses in each matter.
- Appellants/Respondents' Counsel has been working diligently to complete the

initial brief and respectfully requests an additional 15 days to finalize the document.

July 9, 2014

Respectfully submitted, ~



John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, SC 29202

(803) 779-7599

(803) 779-8995 (facsimile)

jsnichols@bntdlaw.com

*Attorney for Appellants/Respondents
Mark Hammond and Larkin Hammond*

Curtis Stodghill, SC Bar # 6458

STODGHILL LAW FIRM

P.O. Box 2431

Greenville, SC 29602

(864) 271-0966

curt@stodghill-law.com

*Attorney for Appellants/Respondents
Front Roe Restaurants, Inc., Beachfront
Foods, Inc., Lake Point Restaurants, Inc.*

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2010-CP-23-1646

RECEIVED

JUL 09 2014

SC Court of Appeals

Kyle Pertuis, Respondent/Appellant,

v.

Front Roe Restaurants, Inc., Beachfront
Foods, Inc., Lake Point Restaurants, Inc.,
Mark Hammond and Larkin Hammond, Appellants/Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Respondent/Appellant with a copy of the *Joint Motion for Extension* by
mailing copies of the same by United States Mail with first class postage prepaid to the
following address:

Robert C. Wilson, Jr., Esquire
201 Whitsett St.
Greenville, SC 29601

July 9, 2014



Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

Margaret Miles Bluestein
John Shannon Nichols
Stacy Elizabeth Thompson
John Dennis Delgado
Allison Paige Sullivan
Ashley Trout Thompson
Blake Alexander Hewitt
Kenneth Henry Dojaquez
John Clarke Newton

OF COUNSEL
O. Eugene Powell, Jr.

July 9, 2014

VIA HAND DELIVERY

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

RECEIVED
JUL 09 2014
SC Court of Appeals

RE: Kyle Pertuis v. Front Roe Restaurants, Inc.
Case Tracking No.: 2013-002257

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a Joint Motion for Extension on behalf of Appellants/Respondents in reference to the above matter. I have also enclosed a proof of service of this document on counsel for the Respondent/Appellant and a \$50.00 check for filing this motion on behalf of the respective parties. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to John S. Nichols

BLUESTEIN, NICHOLS,

THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Curtis W. Stodghill, Esquire
Robert C. Wilson, Jr., Esquire

COLUMBIA 1614 Taylor Street
PO Box 7965 | Columbia, SC 29202
P·803 779.7599 F·803 771.8097

FLORENCE 248 South Irby Street
Florence, SC 29501
P·843 665.9779

CONWAY 1208 3rd Avenue
Conway, SC 29526
P·843 665.9779

TOLL FREE 877 524.4675

BNTDLAW.COM