

TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

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J. RENÉ JOSEY

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July 14, 2014

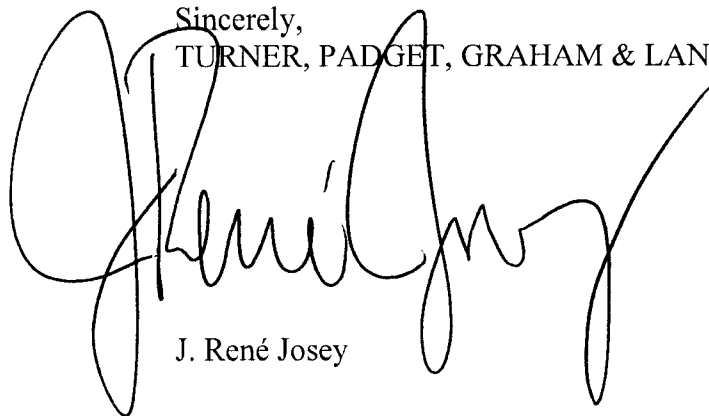
Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Scient Partners, LLC v. Pinnacle Network Solutions and Cliff Smith
Civil Action No.: 2011-CP-21-941
Tracking Number: 2013-001764
TPGL File No.: 7472.103

Dear Ms. Kitchings:

The present due date for the Appellant's initial brief and designation of matter is July 18, 2014. Enclosed please find the original and seven copies of Appellants' Second Consent Motion For Extension Of Time To File Their Initial Brief And Designation Of Matter To Be Included In The Record On Appeal regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof of Service and our check for the filing fee. Finally, enclosed is a motion filing fee check corresponding to this request. Please file the original documents and return clocked copies to me via the stamped self-addressed envelope provided. As indicated in the title of the motion, this motion is made with the gracious consent of counsel for the Respondent. Thank you for your assistance with this matter, and please contact me if you have any questions. I appreciate your consideration.

Sincerely,
TURNER, PADGET, GRAHAM & LANEY, P.A.



J. René Josey

JRJ:vlb

Enclosure

Cc: Robby Hill
Rob King, Esquire

RECEIVED

JUL 14 2014

SC Court of Appeals

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THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

The Honorable R. Knox McMahon, Circuit Court Judge

CASE NO. 2011-CP-21-941

Tracking Number: 2013-001764

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JUL 14 2014

SC Court of Appeals

72858

Scient Partners, LLCAppellant,

v.

Pinnacle Network Solutions, Inc. and Cliff Smith Respondents.

APPELLANT’S SECOND *CONSENT* MOTION FOR
EXTENSION OF TIME TO FILE THEIR INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL

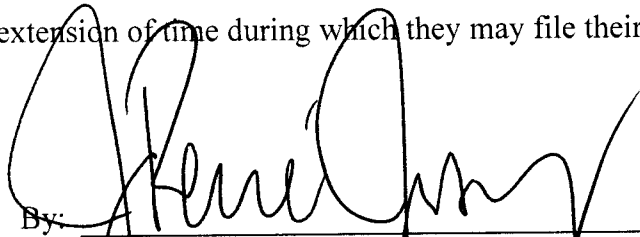
Pursuant to Rule 240 of the South Carolina Rules of Appellate Practice, Scient Partners, LLC (“Appellant”) moves this Court for an Order granting an extension of time during which to file its Initial Brief and Designation Of Matter To Be Included In The Record On Appeal. For the reasons set forth below, Appellant requests an additional period of thirty days from July 18, 2014, during which to file these documents.

The additional time requested, beyond the extension of time previously granted by the Court, is warranted given the complexity of the legal issues presented. The additional time is also sought to determine the applicability of recent appellate court decisions of this State. The thirty-day extension will not prejudice Respondent or Appellants or affect their legal rights.

Counsel for Respondent has graciously consented to this request as reflected in the attached Exhibit A.

Appellants intend to work diligently and to file their Initial Brief and Designation Of Matter as soon as practicable. However, for the reasons stated above, Appellants respectfully request that the Court grant a thirty-day extension of time during which they may file their Initial Brief and Designation Of Matter.

July 14, 2014

By: 

J. René Josey (S.C. Bar # 3230)
Carlyle R. Cromer (S.C. Bar # 100058)
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ATTORNEYS FOR APPELLANT

Josey, J. Rene

Subject: FW: Hillsouth v. Pinnacle

From: Rob King [<mailto:rking@klslawfirm.com>]

Sent: Friday, July 11, 2014 2:15 PM

To: Josey, J. Rene

Cc: Cromer, Carlyle R.

Subject: Re: Hillsouth v. Pinnacle

Sure.

Rob

Sent from my iPad

On Jul 11, 2014, at 1:09 PM, "Josey, J. Rene" <JJosey@TurnerPadget.com> wrote:

Rob – not sure but looks like we might need another (2d) brief extension – current due date is in 1 week. Can you consent again?



J. Rene Josey
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