

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

²
APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Master-in-Equity

Case No.: 2010-CP-32-0460

David R. Gooldy,

Respondent,

v.

The Storage Center – Platt
Springs, LLC,

Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Respondent David R. Gooldy moves this Court for an Order granting extension of thirty (30) days for the Respondent to file and serve its initial brief and designation of matter in the above-captioned appeal. This request is being made due to counsel's present workload and other professional commitments. This is the Respondent's first request for an extension of time.

Counsel for the Respondent's initial brief and designation of matter are currently due on July 9, 2014. If the motion is granted, Respondent's initial brief and designation of matter will be due on August 9, 2014.

72714
RECEIVED
JUL 03 2014
SC Court of Appeals

Counsel for the Respondent has consulted with counsel for Appellant, which she has consented to this thirty day extension. A copy of counsels' email exchange, confirming the extension, is attached hereto as Exhibit A.

DAVIS FRAWLEY, LLC

By: 

James Randall Davis

Randy@oldcourthouse.com

Post Office Box 489

Lexington, South Carolina 29071

Tel No.: (803) 359-2512

**Attorneys for Respondent,
David R. Gooldy**

July 1, 2014

Other Counsel of Record:

Robert E. Stepp

rstepp@sowellgray.com

Bess J. DuRant

bdurant@sowellgray.com

Sowell Gray Stepp & Laffitte, LLC

Post Office Box 11449

Columbia, South Carolina 29211

**Attorneys for Appellant
The Storage Center – Platt Springs, LLC**

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Master-in-Equity

Case No.: 2010-CP-32-0460

David R. Gooldy,

Respondent,

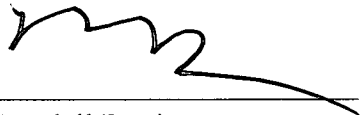
vs.

The Storage Center – Platt Springs, LLC,

Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter on Appellant The Storage Center – Platt Springs, LLC, by email (bdurant@sowellgray.com) and by U.S. regular mail, postage pre-paid on July 2, 2014, addressed to its attorney of record, Bess J. DuRant, Esquire, Sowell Gray Stepp & Laffitte, L.L.C., 1310 Gasden Street, Post Office Box 11449, Columbia, South Carolina 29211.



James Randall Davis
randy@oldcourthouse.com
DAVIS FRAWLEY, LLC
140 East Main Street (29072)
Post Office Box 489
Lexington, South Carolina 29071
Tel: (803) 359-2512
Attorney for Respondent

EXHIBIT A

SOWELL  GRAY

BESS J. DuRANT
Direct Dial 803 231.7832
Direct Fax 803 231.7832
Email bdurant@sowellgray.com

July 2, 2014

VIA FACSIMILE: (803) 359-7478

James Randall Davis, Esquire
Davis Frawley Anderson McCauley Ayer Fisher & Smith, LLC
Post Office Box 489
Lexington, South Carolina 29071

RE: David R. Gooldy v. The Storage Center – Platt Springs, LLC
SC Court of Appeals Case No.: 2014-000741
Civil Action No.: 10-CP-32-0460
SGS&L File No.: 6252/1501

Dear Randy,

I consent to a 30-day extension for you to file and serve your initial brief and designation of matter in the above-referenced matter.

I hope you and yours have a wonderful Fourth.

Very truly yours,



Bess J. DuRant

James Randall Davis
Patrick J. Frawley
Jeff M. Anderson
John J. McCauley ◊
Carey M. Ayer Δ
John F. Fisher
Judith Callison Fisher
Lisa Lee Smith Δ ‡
Ryan M. Wingard
A. Jewitte Dooley
W. Joseph Maye

Of Counsel
Robert K. Bouknight
George S. Nicholson, Jr.

Davis | Frawley
Attorneys at Law

Francis C. Jones
(1919 – 1968)

Hubert E. Long
(1921 – 2000)

Since 1961

◊ American Board of Trial Advocates
Δ Certified Circuit Court Mediator
‡ Certified Circuit Court Arbitrator

July 2, 2014

RECEIVED

JUL 03 2014

SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Edgar A. Brown Building
1205 Pendleton Street
Columbia, South Carolina 29201

RE: David R. Gooldy v. The Storage Center – Platt Springs, LLC
Lexington County Case No.: 2010-CP-32-0460
Our File No.: 25379

Dear Ms. Kitchings:

Pursuant to Rule 240, SCACR, enclosed please find the original and seven copies of our Motion for Extension of Time in the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00 for the filing of the enclosed. Please file the enclosed and returning to me a clocked-in copy via our runner.

By copy of this letter as evidenced by the Proof of Service, I am serving the Appellant The Storage Center – Platt Springs, LLC, with a copy of the same.

Yours very truly,



James Randall Davis

Enclosures

cc: Bess J. DuRant, Esquire
Post Office Box 11449
Columbia, South Carolina 29211

FIRST CLASS MAIL

Davis | Frawley ^{LLC}
Attorneys at Law

140 East Main Street
Old Courthouse Place
P.O. Box 489, Lexington, SC 29024

RECEIVED

JUL 03 2014

SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Edgar A. Brown Building
1205 Pendleton Street
Columbia, South Carolina 29201