

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Circuit Court Judge

Case No. 13-CP-10-5579
Appellate Case No. 2014-001828

73700

JOSHUA FAY,Appellant-Respondent,

vs.

TOTAL QUALITY LOGISTICS, LLC,Respondent-Appellant

**MOTION FOR EXTENSION OF TIME
TO FILE BRIEFS**

Appellant-Respondent hereby moves this Honorable Court for an extension of time to file Briefs and Designations of Matter in this case. Although Appellant-Respondent has filed his Initial Brief and Designation of Matter, the Respondent-Appellant has requested that the transcripts of the oral arguments made to the lower court be ordered. Accordingly, Appellant-Respondent respectfully requests that he be allowed fifteen (15) days after the date receiving the transcript to elect to file an Amended Initial Brief and Designation of Matter and that all subsequent time for filing Briefs be calendared from that date.

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SC Court of Appeals

Respectfully submitted,

ROSEN, ROSEN & HAGOOD, LLC

By: Rene S. Dukes

Alice F. Paylor (SC #4380)

Rene S. Dukes (SC #78215)

151 Meeting Street, Suite 400

Post Office Box 893

Charleston, SC 29402

(843) 577-6726

Attorneys for Appellant-Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
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Roger M. Young, Circuit Court Judge

Case No. 13-CP-10-5579
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JOSHUA FAY,Appellant-Respondent,

vs.

TOTAL QUALITY LOGISTICS, LLC.....Respondent-Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant-Respondent's Motion for Extension of Time to File Briefs by depositing a copy of it in the United States Mail, postage prepaid on September 25, 2014, addressed to attorney of record as follows:

Robert D. Moseley, Jr., Esquire
Peter A. Rutledge, Esquire
Smith Moore Leatherwood
2 West Washington Street, Suite 1100
Greenville, SC 29601

ROSEN, ROSEN & HAGOOD, LLC



Alice F. Paylor (SC #4380)

Rene S. Dukes (SC # 78215)

ROSEN, ROSEN & HAGOOD, LLC

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September 25, 2014

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SC Court of Appeals

ROSEN | HAGOOD

Rene S. Dukes
rdukes@rrhlawfirm.com
(843) 266-8142

September 25, 2014

Sharon L. Vizer
PO Box 1413
Johns Island, SC 29457

Re: Joshua Fay v. Total Quality Logistics, LLC
Court of Common Pleas – Case No. 13-CP-10-5579
Appellate Case No. 2014-001828

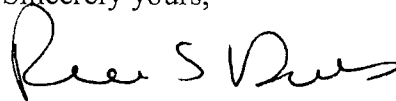
Hearing Date: July 1, 2014 – Judge Roger M. Young, Sr., presiding

Dear Ms. Vizer:

This firm represents Joshua Fay in the above-referenced matter(s). We are requesting a copy of the Hearing Transcript in this matter which took place before Judge Roger M. Young, Sr. on July 1, 2014 in the Charleston County Court of Common Pleas.

If you have any questions, please contact my assistant, Deborah Wooten at (843) 266-8236 or by email at dwooten@rrhlawfirm.com. Thank you for your assistance in this matter.

Sincerely yours,



Rene S. Dukes

RSD/dlw

cc: SC Court of Appeals, Clerk of Court
Office of the Court Administration
Robert D. Moseley, Jr., Esquire
Peter A. Rutledge, Esquire

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Rene S. Dukes
rdukes@rrhlawfirm.com
(843) 266-8142

September 25, 2014

Karen Andersen
3592 Somerset Hills Court
Mount Pleasant, SC 29466

Re: Joshua Fay v. Total Quality Logistics, LLC
Court of Common Pleas – Case No. 13-CP-10-5579
Appellate Case No. 2014-001828

Hearing Date: January 31, 2014 – Judge Roger M. Young, Sr., presiding

Dear Ms. Anderson:

This firm represents Joshua Fay. in the above-referenced matter(s). We are requesting a copy of the Hearing Transcript in this matter which took place before Judge Roger M. Young, Sr. on January 31, 2014 in the Charleston County Court of Common Pleas.

If you have any questions, please contact my assistant, Deborah Wooten at (843) 266-8236 or by email at dwooten@rrhlawfirm.com. Thank you for your assistance in this matter.

Sincerely yours,



Rene S. Dukes

RSD/dlw

cc: SC Court of Appeals, Clerk of Court
Office of the Court Administration
Robert D. Moseley, Jr., Esquire
Peter A. Rutledge, Esquire

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ROSEN | HAGOOD

Rene S. Dukes
rdukes@rrhlawfirm.com

September 25, 2014

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

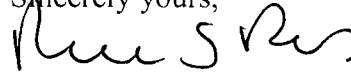
Re: Joshua Fay v. Total Quality Logistics, LLC
Court of Common Pleas – Case No. 13-CP-10-5579
Appellate Case No. 2014-001828

Dear Mrs. Kitchings:

Enclosed please find the original and one copy of Appellant-Respondent Joshua Fay's Motion for Extension of Time to File Briefs in the above-referenced matter, along with our Proof of Service. We would appreciate it if you would please file the original and return a clocked-in copy to us in the enclosed self-addressed, stamped envelope.

Please do not hesitate to contact me if you have any questions. Thank you in advance for your assistance in this matter.

Sincerely yours,



Rene S. Dukes

RSD/dlw
Enclosures

cc: Robert D. Moseley, Jr., Esquire (w/encl)
Peter A. Rutledge, Esquire (w/encl)

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Charleston, South Carolina 29401



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