

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Master-in-Equity

Trial Court Case No.: 2010-CP-32-0460
Appellate Case No.: 2014-000741

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SC Court of Appeals

73492

David R. Gooldy.....Respondent,

vs.

The Storage Center – Platt Springs, LLC.....Appellant.

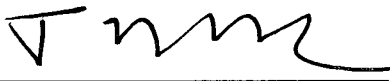
**RESPONDENT’S SECOND MOTION FOR EXTENSION OF TIME TO FILE AND
SERVE THE INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD**

YOU WILL PLEASE TAKE NOTICE that, pursuant to Rules 208, 209, 240, and 263(b) of the South Carolina Appellate Court Rules, the Respondent David R. Gooldy, by and through his undersigned attorney, moves for an Order granting an additional 2-day extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal—through Friday, September 12, 2014. This motion is the Respondent’s second request for extension—the first extension request was made during the initial 30-day response time period after the Notice of Appeal was filed and the second was by Motion filed August 6, 2014—and is made on the grounds that the undersigned counsel has had

other deadlines, depositions, hearings, and other case commitments arise unavoidably over the past two weeks and the coming week, including a non-jury trial on Thursday, September 11, 2014, proper preparation for which has precluded counsel's ability to devote the requisite time to the research and drafting of the Initial Brief of Respondent; and counsel needs the additional time requested herein to properly present focused and cogent arguments in responding to the Appellant's Brief.

This will be the Respondent's final request for extension.

DAVIS FRAWLEY, LLC

By: 

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ATTORNEYS FOR THE RESPONDENT

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September 10, 2014.

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Since 1961

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

September 9, 2014

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 Rules 208, 209, 240 and 263(b), SCACR, enclosed please find the original and seven copies of Respondent's Second Motion for Extension of Time to File and Serve the Initial Brief of Respondent and Designation of Matter to be Included in the Record. 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

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SC Court of Appeals