

September 30, 2014

OCT. 03 2014

**S.C. SUPREME COURT**  
File No.: 20091130.00

The Honorable Daniel E. Shearouse  
Supreme Court of South Carolina  
PO Box 11330  
Columbia, SC 29211-1330

Re: Neshen Mitchell, Individually and as the Next Friend of her Minor Child, Hakeem T.M., Plaintiff, v. Juan P. Marruffo d/b/a Liberty Express, Adrian Morales, RET Partnership, William T. McQueeney, Carl E. Roberts, Karl R. Henderson, and Steven Parham, Defendants

Supreme Court of South Carolina 2013-000670

Dear Mr. Shearouse:

Please be advised that we represent the Respondents in the above-captioned case. We hereby request the maximum extension of time of twenty (20) days in which to file Respondents' Reply Brief, which is currently due on October 6, 2014. By my calculations, this would make the Reply Brief due on October 27, 2014. This is Respondents' First request for an extension, and I have enclosed the filing fee to cover the administrative fee involved.

By way of explanation, please be advised that I am currently heavily involved in trial preparation for a federal jury trial with the Honorable David C. Norton, presiding. Thus, I do not have sufficient time to prepare Respondents' Reply Brief in this case by the current October 6, 2014 deadline. Further, I have received prior consent from Attorney for Appellant, Andrew D. Gowdown.

It is my understanding that his letter is sufficient to make this request for an extension. If a formal motion is needed, please let me know and I will send one immediately. We are notifying opposing counsel of this request by copy of this correspondence.

October 1, 2014  
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Your assistance in this matter is greatly appreciated.

Very truly yours,

CLAWSON and STAUBES, LLC



Christy R. Fagnoli

CRF/keb  
Enclosures

cc: Andrew D. Gowdown, Esquire (via email with enclosures)  
J. Joseph Condon, Jr., Esquire (via email with enclosures)



# The Supreme Court of South Carolina

Clawson & Staubles

10/03/2014

## RECEIPT #73743

**Case No:** 2013-000670  
**Case Short Title:** Neshen Mitchell v. Juan Marruffo  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 183504  
**Check/Money Order Date:** 10/01/2014  
**Comments:**

# CLAWSON STAUBES LLC

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Charleston, SC 29492-8144

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