

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

Case No. 2014-001215

RECEIVED

OCT 06 2014

SC Court of Appeals

73773

Thomas Jackson Construction,

Appellant,

v.

Larry E. Koon and Allen Lee Koon by and
through his attorney in fact, Larry E. Koon,

Respondents.

MOTION

The Respondents respectfully move for an Order allowing them until October 31, 2014 to file their initial brief and counter designations for the record on appeal. The motion is based upon the following:

- (1) The transcript of record was received on September 24, 2014,
- (2) Mr. Dibble, who is lead counsel in this case, was out of the country between September 7, 2014 and September 27, 2014 and
- (3) Ms. Nichols was engaged in other litigation during that time.

The Respondents are authorized to inform the Court the Appellant has no objection to this Motion.

October 2, 2014

WE SO MOVE:



Jennifer Dowd Nichols
S.C. Bar #75916
Attorney for the Respondent
Post Office Box 1000
Chapin, South Carolina 29036
Telephone: (803) 345-3353

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Respondent.

ORDER

The time for serving and filing the Respondent's initial brief and counter designation of matter is hereby extended until October 31, 2014.

FOR THE COURT

By: _____
Clerk

HARRELL & MARTIN, P.A.

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Chapin, South Carolina 29036*

ATTORNEYS AT LAW

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October 6, 2014

VIA HAND DELIVERY

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Thomas Jackson Construction v. Larry E. Koon and Allen Lee Koon by and
through his attorney in fact, Larry E. Koon
Case No. 2014-001215
Our File No. 2014-080

Dear Ms. Kitchings:

Enclosed you will find the Respondents Motion for an extension of time to file their initial brief and counter designations for the record on appeal. For the Court's convenience, we have also included a proposed Order if the Court finds it is appropriate to use it.

If you require any additional information, please let me know.

Very truly yours,



Jennifer Dowd Nichols

cc with enclosures via mail to Mindy Zimmerman, Esq., attorney for Appellant