

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

**RECEIVED**

Carmen T. Mullen, Circuit Court Judge

OCT 16 2014

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Case No.: 2011-CP-07-2300  
Appellate Case No. 2013-000158  
Op. No. 2014-UP-215 (S.C. Ct. App. Filed June 11, 2014)

**S.C. Supreme Court**

Yossi Haina,

Appellant,

v.

Beach Market, LLC,

Respondent.

Of whom

Yossi Haina,

Petitioner,

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MOTION FOR EXTENSION

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The petitioner in this above referenced action, Yossi Haina, by and through his undersigned counsel, hereby files this Motion for Extension of the deadline for filing and serving the petition for a writ of certiorari and the appendix. Pursuant to Rule 240, SCACR, the Petitioner respectfully moves for an extension of time of 10 days, for the Petitioner to file and serve the petition for a writ of certiorari and the appendix.

In support of this Motion for Extension of Time, the Petitioner states the following:

1. The current deadline to file the petition for writ of certiorari and appendix is October 18, 2014 which is a Saturday making the deadline, October 20, 2014. Thus, this

current Motion for Extension has been filed before the date that the petitioner is required to respond.

2. The attorneys of record on this matter, Marshall L. Horton, Esquire, and Lindsay Y. Goodman, Esquire have had an extremely busy court schedule since the Court of Appeals denied rehearing in this matter, including twenty-four (24) family court proceedings/hearings, some of which were all day obligations or trials, three (3) circuit/magistrate court proceedings, a two (2) day family court mediation and one (1) Court of Appeals oral argument. All of these matters have necessitated considerable attorney preparation and time. This is the first request for an extension and it is not anticipated that another request will be necessary, as a ten (10) day extension will be sufficient time to complete the petition for a writ of certiorari and the appendix.

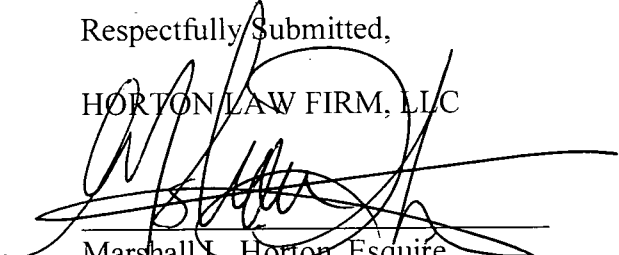
3. This Motion is made in good faith and not for purposes of delay.

4. Counsel for the Respondent has been contacted and does not object to Petitioner's request for an extension in this matter.

WHEREFORE, Petitioner respectfully requests that the Court grant this Motion and order the extension of time requested.

Respectfully Submitted,

HORTON LAW FIRM, LLC



Marshall L. Horton, Esquire  
Lindsay Y. Goodman, Esquire  
49 Boundary Street, 2<sup>nd</sup> Floor  
Post Office Box 3766  
Bluffton, South Carolina 29910  
(843) 757-6190

ATTORNEYS FOR THE  
APPELLANT/PETITIONER

Bluffton, South Carolina  
This 16<sup>th</sup> day of October, 2014

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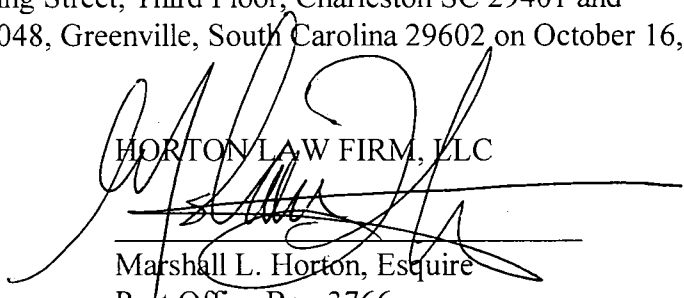
Petitioner,

PROOF OF SERVICE

I certify that I have served the Motion for Extension on Beach Market, LLC, by depositing a copy of it in the United States Mail, postage prepaid, on October 16, 2014, addressed to their attorneys of record, John H. Tiller, Esquire, 134 Meeting Street, Third Floor, Charleston SC 29401 and Sarah P. Spruill, Esquire, Post Office Box 2048, Greenville, South Carolina 29602 on October 16, 2014.

October 16, 2014

HORTON LAW FIRM, LLC

  
Marshall L. Horton, Esquire  
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