

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Jr., Circuit Court Judge

Case No. 2011-CP-42-4538
Appellate Case No. 2014-000902

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OCT 20 2014

SC Court of Appeals

Tietex International Ltd, Respondent,

v.

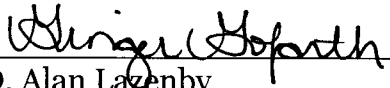
Gary G. Harris, Appellant,

**APPELLANT'S MOTION TO EXTEND TIME TO FILE INITIAL REPLY
BRIEF**

Appellant Gary G. Harris moves pursuant to Rule 240, SCACR for an order extending his time to file and serve the Initial Reply Brief for a period of ten days from the current due date of October 17, 2014, making the Reply Brief due on or before October 27, 2014. Counsel for Appellant during the original ten day reply window prepared for and appeared for oral argument before the Court of Appeals, and also prepared for a summary judgment hearing. Counsel was not able during the original ten day reply period to devote sufficient time to the Reply Brief. Appellant submits that this motion is not interposed for delay, and will not

prejudice Respondents. Appellant also requests that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

Respectfully submitted,



D. Alan Lazenby
Ginger D. Goforth

LAZENBY LAW FIRM
PO Box 6099
Spartanburg, SC 29304
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ATTORNEYS FOR APPELLANT

October 16, 2014

THE STATE OF SOUTH CAROLINA
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J. Derham Cole, Jr., Circuit Court Judge

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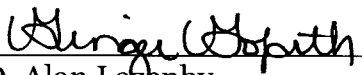
Tietex International Ltd, Respondent,

v.

Gary G. Harris, Appellant,

PROOF OF SERVICE

I, the undersigned, hereby certify the Appellant's Motion to Extend Time to File Initial Reply Brief in the above referenced matter was mailed, postage prepaid, to Respondent's Attorney, Fred Suggs, by sending to Ogletree Deakins Nash Smoak & Stewart PC, PO Box 2757, Greenville, SC 29602, on October 16, 2014.



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October 16, 2014

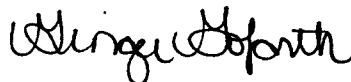
The Honorable Jenny Abbott Kitchings
SC Court of Appeals Clerk
PO Box 11629
Columbia, SC 29211

Re: *Harris v. Tietex International Ltd.*
In the Court of Common Pleas for Spartanburg County
C.A. No: 2011-CP-42-4538
Appellate C.A. No: 2014-00902

Dear Ms. Kitchings:

I enclose herewith an original and one copy of a Motion to Extend Time to File Initial Reply Brief on behalf of Appellant. Please file the original and send a clocked copy back to me in the envelope I have enclosed for your convenience. I appreciate your assistance in this regard.

Sincerely,



Ginger D. Goforth
ginger@lazenbylawfirm.com

GDG: jeh
Enclosures
cc: Fred Suggs, Esq. (via email & US Mail)
Mr. Gary Harris (via email only)

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SC Court of Appeals

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SC Court of Appeals

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