

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

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

Yossi Haina,

Appellant,

v.

Beach Market, LLC,

Respondent.

Of whom

Yossi Haina,

Petitioner,

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OCT 20 2014

SC Court of Appeals

MOTION FOR EXTENSION

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.

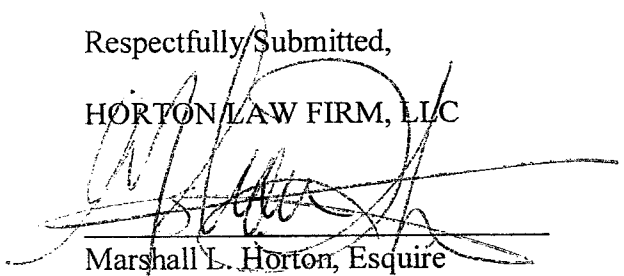
3. This Motion is made in good faith and not for purposes of delay.

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, 2nd Floor
Post Office Box 3766
Bluffton, South Carolina 29910
(843) 757-6190

ATTORNEYS FOR THE
APPELLANT/PETITIONER

Bluffton, South Carolina
This 16th day of October, 2014

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No.: 2011-CP-07-2300
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S.C. Supreme Court

Yossi Haina, Appellant,

v.

Beach Market, LLC, Respondent.

Of whom

Yossi Haina, Petitioner,

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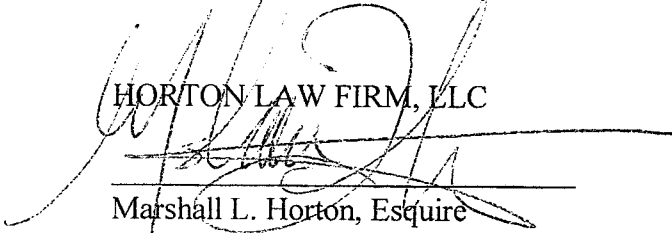
SC Court of Appeals

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
Post Office Box 3766
Bluffton, South Carolina 29910
(843) 757-6190

ATTORNEYS FOR THE
APPELLANT/PETITIONER

HORTON LAW FIRM, LLC

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Writer's Email Address: lyg@hortonlawfirmllc.com

MARSHALL L. HORTON
LINDSAY Y. GOODMAN

October 16, 2014

VIA HAND DELIVERY
The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court Building
1231 Gervais Street
Columbia, South Carolina 2920

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S.C. Supreme Court

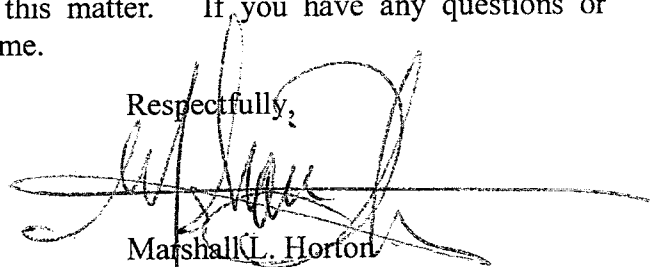
Re: *Yossi Haina v. Beach Market, LLC*
Case No.: 2011-CP-07-2300
Appellate Case No.: 2013-000158

Dear Mr. Shearouse:

Please find enclosed a Motion for Extension to file and serve the Petition for a Writ of Certiorari and Appendix in the above-referenced matter. The current deadline to do so is October 20, 2014 and we are requesting a ten (10) day extension, making the deadline October 30, 2014. The filing fee for this motion in the amount of \$25.00 is enclosed.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.

Respectfully,



Marshall L. Horton
Post Office Box 3677
Bluffton, SC 29910
(843) 757-6190
Attorney for Appellant/Petitioner

LYG/

Enclosure

cc: John H. Tiller, Esq. (via Regular U.S. Mail)
Haynsworth Sinkler Boyd PA

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SC Court of Appeals

134 Meeting Street, 3rd Floor
Charleston, SC 29401

Sarah P. Spruill, Esq. (via Regular U.S. Mail)
PO Box 2048
Greenville, SC 29602

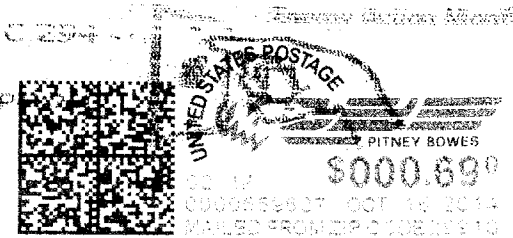
✓ The Honorable Jenny Abbott Kitchings (via Regular U.S. Mail)
Clerk, South Carolina Court of Appeals
Post Office Drawer 11629
Columbia, South Carolina 29211

THE HORTON LAW FIRM, LLC

49 Boundary Street, Second Floor, Post Office Box 3766
Bluffton, South Carolina 29910

CHARLESTON, SC 29404

17 OCT 2014



VIA REGULAR U.S. MAIL
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Drawer 11629
Columbia, South Carolina 29211

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