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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable G. Thomas Cooper, Jr., Circuit Court Judge

Circuit Court Case No. 2010-CP-40-4244

RECEIVED
JUL 30 2012
SC Court of Appeals

Melissa Anne York and Olga Joanne Cristy, Appellants,

v.

Dodgeland of Columbia, Inc. and Jim Hudson Automotive Group,
and Jim Hudson Superstore, a/k/a Jim Hudson Hyundai. Respondents,

**RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE AND/OR TO STAY**

Respondents, Dodgeland of Columbia, Inc., Jim Hudson Automotive Group (who is improperly named and who had no transaction with the Plaintiffs) and Jim Hudson Superstore a/k/a Jim Hudson Hyundai, whose true name is Jim Hudson Cars, LLC d/b/a Jim Hudson Hyundai (who is also improperly named), hereby respectfully move for a three week extension of time for the filing of Respondents' Initial Brief(s) provided in Rule 208, SCACR, regarding the filing of an Respondents' Initial Brief in response to the Initial Brief filed by the Appellants, and regarding the Designation of Matter to be included in the record on appeal on behalf of the Respondents. The Respondents further move for the Court to stay all time limits in Rules 208 and 209, SCACR, for the Respondents to respond and file an Initial Respondents' Brief(s) and responsive

Designation of Matters to be Included in the Record on Appeal from the date of filing this motion and until date of receipt by the parties of a copy of the Order by the Court ruling on this Motion for extension. These above-referenced filings are currently due to be filed by the Respondents no later July 30, 2012. The requested additional three week extension would then make the Respondents' Initial Brief and Respondents' Designation of Matter due no later than August 20, 2012.

The reasons for this motion for an additional three weeks and related stay of the current deadlines from the date of filing said extension request are due to the current work loads of the counsel of record, including multiple two-week trial out of State which is ongoing as this time, additional and unexpected briefing demands due to developments in a multi-state matter for the State of South Carolina that occurred up to the date of trial and during trial related to witness issues and newly discovered evidence that had to be addressed, and a number of other deadlines, counsel has not been able to complete the research and drafting necessary to complete the Initial Respondents' Brief(s) and responsive Designation of Matters to be Included in the Record on Appeal. The Respondents respectfully request to be allowed the additional time requested. This motion is not made for the purpose of undue delay, but due to unexpected demands and unforeseeable illness of counsel.

Prior to filing this motion, the undersigned attorney for Respondents, C. Jo Anne Wessinger Hill, did consult with counsel for the Appellants and has been advised that the Appellants do not have any objection and did consent to the motion to stay and for the extension of time of an additional three weeks.

WHEREFORE, undersigned counsel for Respondents pray that this Court shall issue an Order staying the time limits set forth in Rules 208 and 209, SCACR, for the Respondents to respond and file an Initial Respondents' Brief(s) and responsive Designation of Matters to be Included in the Record on Appeal from the date of filing this motion and until the parties receive a copy of the Order of the Court deciding this Motion for extension.

WHEREFORE, undersigned counsel for Respondents pray that this Court shall issue an Order allowing the additional time requested and extending for an additional three (3) weeks the time limits set forth in Rules 208 and 209, SCACR, for the Respondents to respond and file an Initial Respondents' Brief(s) and responsive Designation of Matters to be Included in the Record on Appeal so that the referenced filings shall be due no later than August 20, 2012.

Respectfully submitted this 30th day of July, 2012,

RICHARDSON PLOWDEN
ROBINSON, P.A.

& RICHARDSON PLOWDEN &
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By: 

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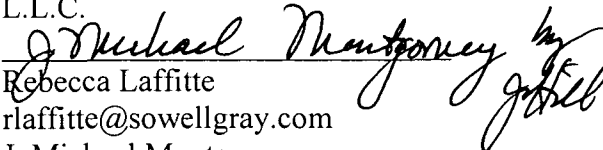
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ATTORNEYS FOR DEFENDANT JIM HUDSON
AUTOMOTIVE GROUP, AND JIM HUDSON
SUPERSTORE, A/K/A JIM HUDSON WHOSE
TRUE AND CORRECT NAME IS JIM HUDSON
CARS, LLC D/B/A JIM HUDSON HYUNDAI

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ATTORNEYS FOR DEFENDANT,
DODGELAND OF COLUMBIA, INC.

Columbia, South Carolina

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and Jim Hudson Superstore, a/k/a Jim Hudson Hyundai. Respondents,

PROOF OF SERVICE

The undersigned employee of RICHARDSON PLOWDEN & ROBINSON, P.A., attorneys for Appellant, does hereby certify that service of the foregoing **RESPONDENTS' RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE AND/OR TO STAY** in the above-captioned matter was made upon all counsel of record this 30th day of July 2012, by electronic mail and by depositing a copy of same in the U.S. Mail, postage prepaid, addressed as follows:

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Kathy J. Templeton

July 30, 2012
Columbia, South Carolina

July 30, 2012

The Honorable Jenny Abott Kitchings
Clerk of Court
South Carolina Court of Appeals
1205 Pendleton Street
Columbia, South Carolina 29201

Re: York, Melissa et al v. Dodgeland of Columbia et al
Case No. 2011199006

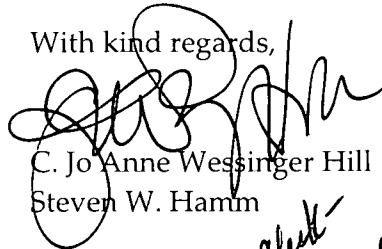
Dear Ms. Kitchings:

Enclosed please find the original and six copies, Respondents' Motion for Extension, together with our check in the amount of \$25.00.

If you should have any questions or concerns, please do not hesitate to contact this office.

With kindest regards, I am

With kind regards,



C. Jo Anne Wessinger Hill
Steven W. Hamm

CJWH:kjt
Enclosures

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*Madam Clerk -
as noted in the
attached motion the
Appellants' consent and
agree to the extension
requested. Thank you -
Julie*