

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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SEP 25 2014

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

SC Court of Appeals

13659

G. Thomas Cooper, Jr., Circuit Court Judge

9-26  
10-27

Appellate Case No. 2014-001397

151

Thomas J. Levine.....Appellant,

v.

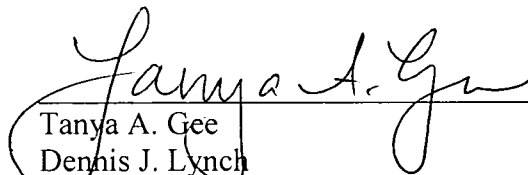
Carolina Craft Acquisitions, LLC.....Respondent.

**MOTION FOR AN EXTENSION TO FILE INITIAL RESPONDENT'S BRIEF**

The parties have reached a settlement in principal of the above-captioned matter, but have not yet finally resolved the details of the settlement. Because a full settlement seems likely, Respondent seeks an extension to file its Respondent's Brief, in order to avoid the unnecessary legal expense of drafting a brief in the probable event that this appeal is withdrawn. Accordingly, Respondent respectfully requests 30-day extension of time to file its Respondent's Initial Brief and Designation of Matter. The undersigned has contacted opposing counsel, and they consent to this request.

*[Signature block on following page]*

Respectfully submitted,

A handwritten signature in cursive script that reads "Tanya A. Gee". The signature is written in black ink and is positioned above a horizontal line.

Tanya A. Gee  
Dennis J. Lynch  
Amy H. Geddes  
NEXSEN PRUET, LLC  
Post Office Drawer 2426  
Columbia, SC 29202  
Tel: 803-771-8900  
Attorneys for Respondent

September 25, 2014

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Thomas J. Levine.....Appellant,

v.

Carolina Craft Acquisitions, LLC.....Respondent.

**PROOF OF SERVICE**

I certify that on this 25<sup>th</sup> day of September, 2014, I have served the foregoing Motion for an Extension via U.S. Mail, first class postage prepaid, on the following counsel of record:

Wesley D. Few  
WESLEY D. FEW, LLC  
1527 Blanding St.  
Columbia, SC 29201

Kathleen Chewning Barnes  
Barnes Law Firm, LLC  
P.O. Box 897  
607 2<sup>nd</sup> Street East  
Hampton, SC 29924



Laura Thomason  
Legal Assistant to Tanya A. Gee



# NEXSEN | PRUET

**Tanya A. Gee**  
Special Counsel

September 25, 2014

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SEP 25 2014

**HAND DELIVERED**

**SC Court of Appeals**

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

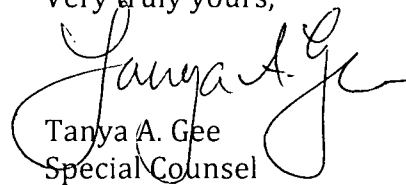
Re: *Thomas J. Levine vs. Carolina Craft Acquisitions, LLC*  
Appellate Case No.: 2014-001397

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter is an original and one copy of a Motion for Extension to File Initial Respondent's Brief. Please file the original and return a received-stamped copy to me via our courier. Also enclosed is our check in the amount of \$25.00 which represents the filing fee for the same, and a Proof of Service reflecting that opposing counsel has been served with a copy of the Motion by first class mail.

- Charleston
- Charlotte
- Columbia**
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh

Very truly yours,



Tanya A. Gee  
Special Counsel

TAG/lt  
Enclosures

cc (w/encls.): Wesley D. Few, Esquire  
Kathleen Chewing Barnes, Esquire