

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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NOV 26 2014
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2014-001397

Thomas J. Levine.....Appellant,
v.
Carolina Craft Acquisitions, LLC.....Respondent.

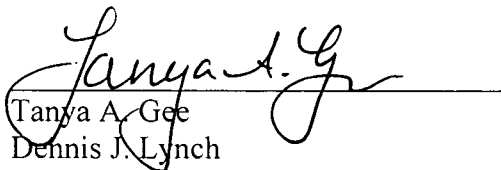
MOTION FOR AN EXTENSION TO FILE INITIAL RESPONDENT’S BRIEF

As this Court is aware, the parties have reached a settlement in principle in the above-captioned matter. The finalizing of the settlement has involved prolonged negotiations regarding the resolution of “global” issues that also pertain to member and creditor claims against the Respondent. However, the remaining issues appear to have been resolved insofar as the settlement is concerned, and a fully-executed settlement is expected shortly.

Because a settlement is imminent, Respondent respectfully requests a third extension of time to file its Respondent’s Brief. This extension is sought in good faith and in an effort to avoid the unnecessary legal expense of drafting a brief when this appeal is likely to be withdrawn. The undersigned has contacted opposing counsel, and they have given limited consent for an extension only until December 5, 2014 and under the condition that this be the last request for an extension by either party. Nine days from the date of this filing (as proposed by the Appellant) will not be near sufficient time for the Respondent to prepare and

file its brief. In the event a settlement agreement is not reached, the undersigned will provide this Court with a status update by Friday, December 5, 2014, and would respectfully request thirty days to file its Respondent's Brief.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Tanya A. Gee", is written over 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

November 26, 2014

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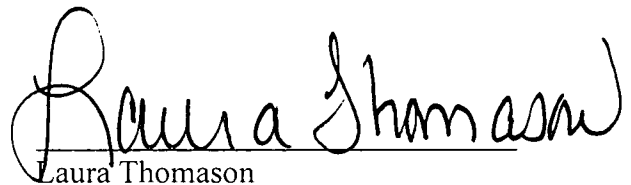
Carolina Craft Acquisitions, LLC.....Respondent.

PROOF OF SERVICE

I certify that on this 26th day of November, 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 Chewing Barnes
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P.O. Box 897
607 2nd Street East
Hampton, SC 29924



Laura Thomason
Legal Assistant to Tanya A. Gee

Tanya A. Gee
Special Counsel

November 26, 2014

HAND DELIVERED

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

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SC Court of Appeals

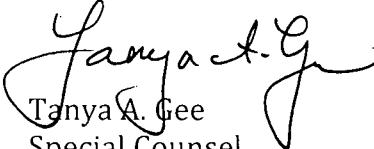
Re: *Thomas J. Levine vs. Carolina Craft Acquisitions, LLC*
Appellate Case No.: 2014-001397

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter please find an original and seven (7) copies 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/llt
Enclosures

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