

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Maite D. Murphy
Circuit Court Judge

74242

Case No. 2011-CP-07-04999

STEFFANI WALTHER and MICHAEL D. WALTHER.....Appellants,

v.

EDDIE MAPLE and KATE MAPLE, INDIVIDUALLY and
d/b/a EQUINE MANAGEMENT, LLC.....Respondents.

**NOTICE OF MOTION AND MOTION
TO EXTEND TIME AND
MEMORANDUM**

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NOV 21 2014

SC Court of Appeals

The Respondents, Eddie Maple and Kate Maple, individually and d/b/a Equine Management, LLC, by and through their undersigned attorney, pursuant to Rule 240, SCACR, move the Court of Appeals for an order extending the time for the Respondents to file and serve their Initial Brief and Designation of Matter through and including Monday, November 19, 2014.

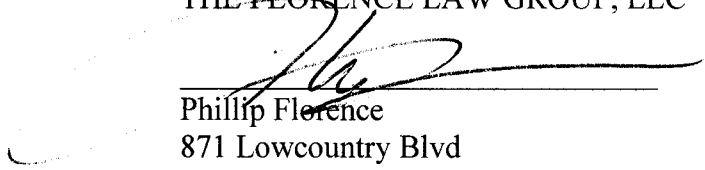
As appears from the affidavit of Respondents' counsel, which is attached to this motion, Respondents' counsel is a Solo Practitioner and has not been able to fully prepare Respondents' Initial Brief and Designation of Matter To Be Included in the Record on Appeal due to

unforeseen obligations and other previously scheduled matters. Accordingly, Respondents' counsel respectfully requests a twenty (20) day extension of time to December 9, 2014, to file Respondents' Initial Brief and Designation of Matter To Be Included in the Record on Appeal in this matter. No previous extension has been sought by the Respondents.

MEMORANDUM

The relief requested in the motion set forth above is authorized by Rule 240, SCACR.

THE FLORENCE LAW GROUP, LLC



Phillip Florence

871 Lowcountry Blvd

Suite 100

Mt. Pleasant, South Carolina 29464

Telephone: (843) 352-2667

Fax: (843) 352-2668

Email: phil@theflorencelaw.com

ATTORNEYS FOR RESPONDENTS

November 19, 2014
Charleston, South Carolina.

THE STATE OF SOUTH CAROLINA
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**AFFIDAVIT OF
PHILLIP FLORENCE, JR.**

PERSONALLY appeared before me Phillip Florence, Jr. (herein sometimes "the Affiant"), who, first being duly sworn, says under oath the following:

1. I was admitted into the practice of law in South Carolina in 1994 and am in good standing and an active member of the South Carolina Bar Association and the Charleston County Bar Association. I am also admitted to practice before the United States District Court, District of South Carolina and the Fourth Circuit Court of Appeals.

2. I am the attorney of record for the Respondents in the above-captioned action, and am currently a Solo Practitioner practicing in Charleston, S.C.

3. The Respondents' Initial Brief and Designation of Matter To Be Included in the Record on Appeal otherwise is due on Wednesday, November 19,

2014.

4. Due to unforeseen obligations and other previously scheduled matters, I have been unable to fully prepare the Respondents' Initial Brief and Designation of Matter To Be Included in the Record on Appeal.

5. Accordingly, I respectfully request a twenty (20) day extension of time to December 9, 2014, to file Respondents' Initial Brief and Designation of Matter To Be Included in the Record on Appeal in this matter.

6. No previous extensions of time have been sought by Respondents in this matter.

FURTHER THE AFFIANT SAYETH NOT.

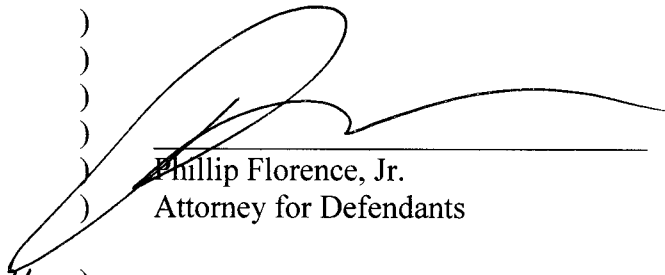
SWORN AND SUBSCRIBED)

before me this 19th)
day of November, 2014.)

Michael Stan Maul)

Notary Public for South Carolina)

My commission expires: Oct 12, 20 21)



Phillip Florence, Jr.
Attorney for Defendants

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Maite D. Murphy
Circuit Court Judge

Case No. 2011-CP-07-04999

STEFFANI WALTHER and MICHAEL D. WALTHER.....Appellants,

v.

EDDIE MAPLE and KATE MAPLE, INDIVIDUALLY and
d/b/a EQUINE MANAGEMENT, LLC.....Respondents.

PROOF OF SERVICE

I, Phillip Florence, Jr., hereby certify that on November 19, 2014, I filed and served by mail the originals and copies of the Notice of Motion and Motion to Extend Time and Memorandum and the Affidavit of Phillip Florence, Jr., both dated November 19, 2014, by depositing same, with sufficient first class postage prepaid, at the United States Post Office at Charleston, South Carolina, addressed as follows:

The Honorable Jenny Abbott Kitchings Clerk
of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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NOV 21 2014

SC Court of Appeals

Robert V. Mathison Jr.
Mathison & Mathison
PO Box 5271
Hilton Head Island, S.C. 29938

THE FLORENCE LAW GROUP, LLC

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Fax: (843) 352-2668
Email: phil@theflorencelaw.com
ATTORNEYS FOR RESPONDENTS



FLORENCE
LAW GROUP

Phillip Florence, Jr.
Attorney at Law

November 19, 2014

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Steffani Walther & Michael Walther v. Eddie Maple & Kate Maple,
individually and d/b/a Equine Management, LLC
Case No.: 2011-CP-07-4999
Appellate Case No.: 2013-002569

Dear Ms. Kitchings,

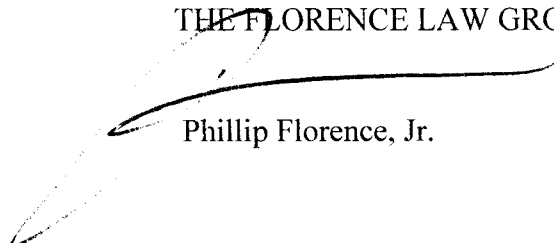
I am enclosing herewith for filing the original and six copy of the following documents:

1. Respondents' Notice of Motion and Motion to Extend Time to file Respondents' Initial Brief and Designation of Matter dated November 19, 2014; and
2. The Affidavit of Phillip Florence, Jr. dated November 19, 2014.

Also enclosed are the original Proof of Service and a filing fee check in the amount of \$25.00.

By copy of this letter to Plaintiff's counsel, Robert V. Mathison, Esquire, I am this day serving him with copy of same.

Sincerely,
THE FLORENCE LAW GROUP



Phillip Florence, Jr.

cc: Robert V. Mathison, Jr.

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SC Court of Appeals



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The Honorable Jenny Abbott Kitchings
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