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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

DEC 12 2014

**SC Court of Appeals**

APPEAL FROM LEXINGTON COUNTY  
In the Court of Common Pleas

Edgar W. Dickson, Presiding Judge

Case No. 2012-CP-32-1472  
Appellate Case No. 2014-001154

Lydia Miller and Doris Knight.....Plaintiffs,

v.

Willie Fields, Paula White, and The Refurb Center, Inc.....Defendants,

of whom:

Lydia Miller.....Respondent,

v.

Willie Fields.....Appellant.

**MOTION FOR EXTENSION**

The undersigned, as counsel for Appellant Willie Fields, hereby moves for a Thirty (30) day extension of time to file its Initial Brief(s) and Designation of Matter. These documents are currently due on or before December 22, 2014.

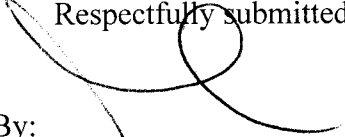
This motion is made on the grounds that other obligations and deadlines will prevent the undersigned from completing this Brief and Designation by its current deadline.

This extension request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculation,

the extension, if granted, would extend Appellant's deadline for filing the initial brief and designation of matter to Wednesday, January 21, 2015.

No prior extension has been requested by Appellant on this matter. The Appellant's check for \$25.00 is enclosed.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of its Initial Brief(s) and Designation of Matter to January 21, 2015.

Respectfully submitted,  


By: \_\_\_\_\_  
S. Jahue Moore  
John C. Bradley, Jr.  
MOORE TAYLOR LAW FIRM, PA  
1700 Sunset Boulevard  
West Columbia, SC 29169  
803-796-9160  
803-791-8410 (Fax)  
[john@mttlaw.com](mailto:john@mttlaw.com)  
Attorneys for Appellant

West Columbia, SC  
December 11, 2014

Other Counsel of Record:

Joshua Koger, Jr., Esquire  
Koger Law Firm  
1408 Russell Street  
P. O. Box 513  
Orangeburg, SC 29116  
(803) 535-0111  
ATTORNEY FOR THE RESPONDENT

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
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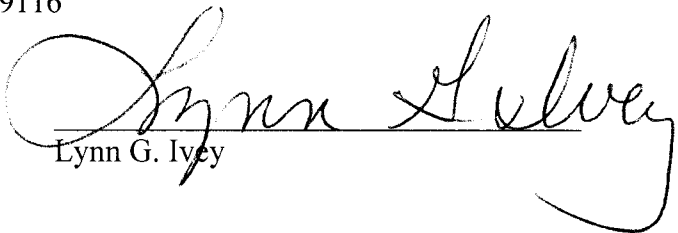
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**PROOF OF SERVICE**

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I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served Appellant's Motion for Extension on counsel of record for Respondent in this action by depositing a copy of same in the United States Mail, postage prepaid, on December 11, 2014, addressed as follows:

Joshua Koger, Jr., Esquire  
Koger Law Firm  
P.O. Box 513  
Orangeburg, SC 29116

  
Lynn G. Ivey

West Columbia, South Carolina  
December 11, 2014

# MOORE TAYLOR

December 11, 2014

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**SC Court of Appeals**

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

RE: Lydia Miller v. Willie Fields  
Appellate Case No. 2014-001154

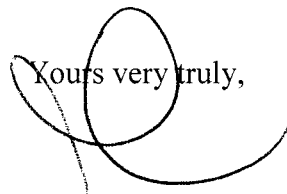
Dear Ms. Kitchings:

Enclosed please find the original and three copies of Appellant's Motion for Extension in the above referenced matter. A check for \$25.00 for filing the motion.

Please file the original and return the extra copies to my courier. Under cover of this letter I am serving counsel for the opposing party with the same.

If you have any questions, please do not hesitate to contact me.

With kindest regards, I am,

Yours very truly,  


John C. Bradley, Jr.

/lgi

Enclosures

cc: Joshua Koger, Jr. Esquire