

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Charleston County  
Court of Common Pleas  
Hon. J.C. Nicholson, Jr., Circuit Court Judge

**RECEIVED**

DEC 17 2014

**S.C. SUPREME COURT**

Case No. 2009-CP-10-6529  
Op. No. (5208)

Amber Johnson.....Petitioner,

v.

Stanley E. Alexander, Mario S. Inglese and Mario S. Inglese, P.C.,  
of whom Stanley E. Alexander is the .....Respondent.

v.

Mario S. Inglese and Mario S. Inglese, P.C.....Third Party Plaintiffs,

v.

Charles Feeley.....Third Party Defendant.

Appellate Case No. 2014-001167

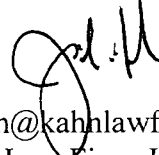
**PETITIONER’S CONSENT MOTION FOR EXTENSION TO FILE  
APPENDIX AND BRIEFS AS PROVIDED BY RULE 242(i), SCACR**

WHEREAS Petitioner’s Petition for a Writ of Certiorari in this matter was granted on December 10, 2014 and counsel for Petitioner needs an extension of time to file the appendix and briefs pursuant to Rule 242(i), SCACR, due to counsel having an out of state CLE for which to prepare, out of state family vacation and other holiday conflicts; and

WHEREAS counsel for Petitioner has received consent from Robert Goings, Esq., counsel for Respondent, for an extension providing counsel for Petitioner to have until February 9, 2015 to file the appendix and briefs;

Counsel for the Petitioner hereby moves for an extension to allow Petitioner to file her appendix and brief no later than February 9, 2015.

Justin S. Kahn



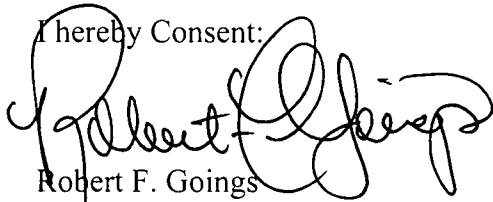
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**Attorneys for Petitioner  
Amber Johnson**

Charleston, SC  
December 15, 2014

I hereby Consent:



Robert F. Goings  
Goings Law Firm, LLC  
PO Box 436  
Columbia, SC 29202

Joel W. Collins, Jr.  
Collins & Lacy, P.C.  
PO Box 12487  
Columbia, SC 29211

**Attorneys for Respondent**  
**Stanley E. Alexander**

Columbia, SC  
December 12, 2014

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Charleston County  
Court of Common Pleas  
Hon. J.C. Nicholson, Jr., Circuit Court Judge

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Case No. 2009-CP-10-6529  
Op. No. (5208)

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Amber Johnson.....Petitioner,

v.

Stanley E. Alexander, Mario S. Inglese and Mario S. Inglese, P.C.,  
of whom Stanley E. Alexander is the .....Respondent.

v.

Mario S. Inglese and Mario S. Inglese, P.C.....Third Party Plaintiffs,

v.

Charles Feeley.....Third Party Defendant.

Appellate Case No. 2014-001167

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**PROOF OF SERVICE**

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**ATTORNEYS FOR RESPONDENT**  
**AMBER JOHNSON**

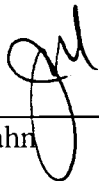
Mary Leigh Arnold  
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I, Justin S. Kahn, do hereby affirm that on December 15, 2014, I served one copy of Petitioner's Consent Motion for Extension to File Appendix and Briefs as Provided by Rule 242(i), SCACR on the following named individuals by placing a copy in the United States Mail, first class, postage prepaid addressed to the following:

Joel W. Collins, Jr.  
**Collins & Lacy, P.C.**  
Post Office Box 12487  
Columbia, SC 29211

Robert F. Goings  
**Goings Law Firm, LLC**  
914 Richland St., Ste. A-101  
Columbia, SC 29201

**Attorneys for Appellant**  
**Stanley E. Alexander**

  
\_\_\_\_\_  
Justin S. Kahn

Charleston, South Carolina  
December 15, 2014

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ELLIS I. KAHN\*^  
JUSTIN S. KAHN\*^  
WES B. ALLISON

December 15, 2014

Hon. Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

**RECEIVED**

DEC 17 2014

Re: **Amber Johnson v. Stanley Alexander**  
Case No.: **2009-CP-10-06529**

**S.C. SUPREME COURT**

**Appellate Case No.: 2014-001167**

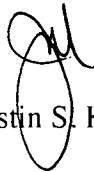
Dear Mr. Shearouse:

Enclosed for filing is an original and 7 copies of Petitioner's Consent Motion for Extension to File Appendix and Briefs as Provided by Rule 242(i) SCACR, along with Proof of Service. I have also enclosed a check for the filing fee. By copy of this letter I am serving this motion on counsel for Respondent.

Please file the originals and six copies, mark the extra copy filed and return it to us in the enclosed, postage-prepaid envelope.

Thank you very much.

Sincerely,

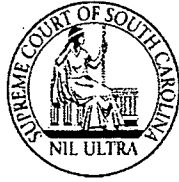


Justin S. Kahn

JSK/pm

Encl.

cc: Joel W. Collins, Esq. (via U.S. Mail, w/encl.)  
Robert F. Goings, Esq. (via U.S. Mail, w/encl.)  
Mary Leigh Arnold, Esq. (via email, w/encl.)



# The Supreme Court of South Carolina

Kahn Law Firm

12/17/2014

## RECEIPT #74493

**Case No:** 2014-001167  
**Case Short Title:** Amber Johnson v. Stanley Alexander  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 19009  
**Check/Money Order Date:** 12/15/2014  
**Comments:**