

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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DEC 10 2014

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

SC Court of Appeals

J. Derham Cole, Circuit Court Judge

Case No.: 2009-CP-42-00781

Ray and Mary LongAppellants.

v.

Tuck and Howell, Inc.....Respondent.

RESPONDENT TUCK AND HOWELL, INC.'S MOTION FOR AN
EXTENSION OF TIME TO FILE AND SERVE ITS INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL

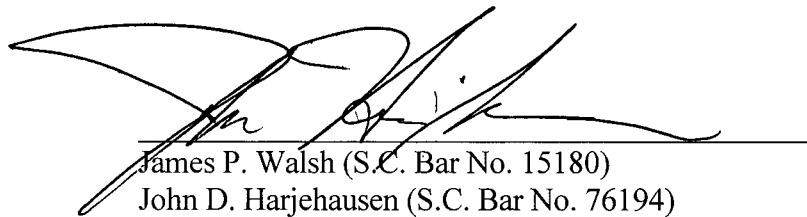
Respondent Tuck and Howell, Inc. ("Moving Respondent") hereby respectfully moves this Court for an Order granting Respondent an extension of time in which to file and serve its Initial Brief and Designations of Matter to be included in the Record on Appeal. Counsel for Respondent has been conscientious in their efforts to prepare and respond to this appeal and will continue to do so as expeditiously as possible. Due in part to the fact that counsel currently has a number of pending deadlines for other cases, counsel anticipates needing additional time to complete Moving Respondent's Initial Brief and Designations of Matter for the Record.

Moving Respondent hereby requests a thirty (30) day extension of the deadline for its Initial Brief and Designations. The current deadline for those materials is December 26, 2014. The new deadline will be January 26, 2015.

Moving Respondent appreciates the Court's time, attention, and assistance with this matter.

Dated this 9th day of December, 2014.

CLARKSON, WALSH, TERRELL & COULTER, P.A.

A handwritten signature in black ink, appearing to be 'James P. Walsh', is written over a horizontal line. The signature is fluid and cursive.

James P. Walsh (S.C. Bar No. 15180)

John D. Harjehausen (S.C. Bar No. 76194)

CLARKSON, WALSH, TERRELL & COULTER, P.A.

1164 Woodruff Road

Post Office Box 6728

Greenville, South Carolina 29606

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Fax: (864) 235-4399

ATTORNEYS FOR RESPONDENT

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No.: 2009-CP-42-00781

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74444

Ray and Mary LongAppellants.

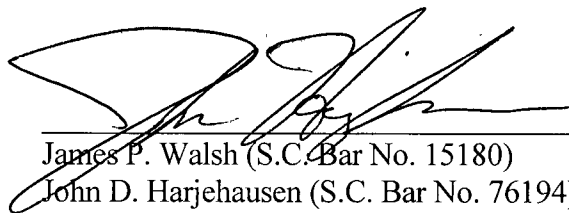
v.

Tuck and Howell, Inc.....Respondent.

PROOF OF SERVICE

I certify that I have served the respondent's Motion for Extension of Time and Proof of Service, by mailing a copy, postage prepaid, to appellants Ray and Mary Long, at 131 Taylor Road, Greer, South Carolina, 29651, on December 9th, 2014.

CLARKSON, WALSH, TERRELL & COULTER, P.A.



James P. Walsh (S.C. Bar No. 15180)

John D. Harjehausen (S.C. Bar No. 76194)

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ATTORNEYS FOR RESPONDENT

CLARKSON, WALSH, TERRELL & COULTER, P.A.

ATTORNEYS AT LAW

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SC Court of Appeals

December 9, 2014

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

Re: Ray and Mary Long, Appellants v. Tuck and Howell, Inc., Respondent
Case No. 2009-CP-42-00781

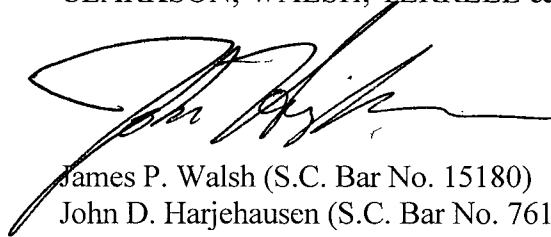
Dear Ms. Kitchings:

Enclosed for filing are an original and six (6) copies of the Respondent's Motion for Extension of Time and Proof of Service. Also enclosed is a check in the amount of \$25.00 for the filing fee.

Thank you for your kind consideration and assistance. Please feel free to call if you should have any questions regarding this matter.

Yours very truly,

CLARKSON, WALSH, TERRELL & COULTER, P.A.



James P. Walsh (S.C. Bar No. 15180)
John D. Harjehausen (S.C. Bar No. 76194)
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Greenville, South Carolina 29606
Phone: (864) 232-4400
Fax: (864) 235-4399
ATTORNEYS FOR RESPONDENT

JPW/jdh

Enclosure(s)

cc: Ray and Mary Long

FedEx

TRK# 8992 5979 2314
0215

WED - 10 DEC 10:30A
PRIORITY OVERNIGHT

DEC 10 2014 29201
SC-US CAE

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FTD 391913 09DEC14 GSPA 522C2/DC75/65DD

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Form ID No. 0215

press

NEW Package
Express US Airbill

FedEx Tracking Number 8992 5979 2314

FedEx Tracking Number 899259792314

John Harjehausen Phone 864 232-4400

LARKSON WALSH

Address 1164 WOODRUFF RD

City GREENVILLE State SC ZIP 29607-4127

Your Internal Billing Reference

To Recipient's Name Clerk of Court Phone 803 734-1840

Company S.C. Court of Appeals

Address 1015 SUMNER ST. Dept./Floor/Suite/Room

Address Use this line for the HOLD location address or for continuation of your shipping address.

City Columbia State SC ZIP 29201

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8992 5979 2314

4 Express Package Service

NOTE: Service order has changed. Please select carefully.

Next Business Day

FedEx First Overnight Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Priority Overnight Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Standard Overnight Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

NEW FedEx 2Day A.M. Second business morning. Saturday Delivery NOT available.

FedEx 2Day Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Express Saver Third business day. Saturday Delivery NOT available.

5 Packaging

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options

SATURDAY Delivery NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver

No Signature Required Package may be left without obtaining a signature for delivery.

Direct Signature* Someone at recipient's address may sign for delivery. Fee applies.

Indirect Signature If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

One box must be checked.
 No Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required. Dry Ice Dry ice, 3, UN 1845 x kg
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box. Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Acct. No.
 Sender Acct. No. in Section 1 will be billed Recipient Third Party Credit Card Cash/Check

Total Packages Total Weight Credit Card Auth.

*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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