

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY
In the Court of Common Pleas

R. Ferrell Cothran, Jr., Presiding Judge

Appellate Case No. 2014-001903

RECEIVED

JAN 22 2015

SC Court of Appeals

14830

Milton Oakley Dickson,.....Appellant,

v.

Arthur B. Beasley, Jr.,.....Respondents,

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S REPLY BRIEF


The undersigned, as counsel for Appellant Milton Oakley Dickson, hereby moves for a Ten (10) day extension of time to file its Reply Brief. This Motion is made on the grounds that John C. Bradley, Jr., the undersigned counsel for Appellant Milton Oakley Dickson was out of state for depositions beginning Monday, January 19th through January 22nd. In addition, there is an apparent issue in regards to the date of service of the Initial Brief of the Respondent. The proof of service was signed on January 13, 2015. However, the cover letter and postmark are dated January 14, 2015. Due to Mr. Bradley being out of state, and the issue with the date of service, additional time is needed to prepare and file the Reply Brief. 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 calculations the extension, if granted, would extend Appellant's deadline

for filing the reply brief to Tuesday, February 3, 2015. Appellant will not request any additional time to prepare and file its Reply Brief beyond that date.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Initial Brief(s) and Designation of Matter to February 3, 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
Attorneys for Appellant
Milton Oakley Dickson

West Columbia, SC
January 22, 2015

RECEIVED

JAN 22 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY
In the Court of Common Pleas

R. Ferrell Cothran, Jr., Presiding Judge

Appellate Case No. 2014-001903

Milton Oakley Dickson,.....Appellant,

v.

Arthur B. Beasley, Jr.,.....Respondents,

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter upon counsel of record, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, addressed as listed below.

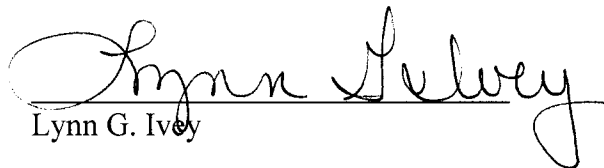
Kenneth R. Young, Jr., Esquire
YOUNG, KEFFER & ASSOCIATES, P.A.
23 West Calhoun Street
Sumter, SC 29150

RECEIVED

JAN 22 2015

SC Court of Appeals

DOCUMENT(S): 1. Motion for Extension of Time to File Appellant's Reply Brief


Lynn G. Ivey

West Columbia, South Carolina
January 22, 2015



January 22, 2015

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
P.O. Box 11629
Columbia, SC 2921
VIA HAND DELIVERY

RE: Milton Oakley Dickson v. Arthur B. Beasley, Jr
Appellate Case No. 2004-001903

Dear Ms. Kitchings:

I trust this letter finds you well. Our office represents the Appellant in the above-captioned appeal. Please find enclosed our Motion for Extension to File Reply. Due to my being out of state for depositions this week, as well as an issue with the date of Respondent's Proof of Service and the subsequent due date for reply, I am respectfully requesting a ten day extension. The original and six copies of our motion are provided. Please return the clocked copies to my courier.

By copy of this letter, I am providing opposing counsel notice of our Motion.

With kindest regards I am,

Respectfully yours,

A handwritten signature in black ink, appearing to be 'John C. Bradley, Jr.', written over the typed name.

John C. Bradley, Jr.

/lgi
cc: Kenneth R. Young, Jr. Esquire

RECEIVED

JAN 22 2015

SC Court of Appeals