

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 26 2015

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Master-in-Equity

Trial Court Case No.: 2010-CP-32-0460
Appellate Case No.: 2014-000741

David R. Gooldy.....Respondent,

vs.


The Storage Center – Platt Springs, LLC.....Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE
AND SERVE THE FINAL BRIEF OF RESPONDENT**

YOU WILL PLEASE TAKE NOTICE that, pursuant to Rules 211 of the South Carolina Appellate Court Rules, the Respondent David R. Gooldy, by and through his undersigned attorney, moves for an Order granting an extension of time within which to serve and file the Final Brief of Respondent—through Monday, January 26, 2015. This motion is the Respondent's request for extension and is made on the grounds that the undersigned counsel has had other deadlines, depositions, hearings, and other case commitments arise unavoidably recently, proper preparation for which has precluded counsel's ability to devote the requisite time to prepare the Final Brief.

DAVIS FRAWLEY, LLC

By: _____


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ATTORNEYS FOR THE RESPONDENT

Lexington, South Carolina

January 26, 2015

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PROOF OF SERVICE

I certify that I have served the Respondent's Motion for Extension of Time to File and Serve the Brief of Respondent and Final Brief of Respondent, by email (rstepp@sowellgray.com) and (bdurant@sowellgray.com) and by U.S. regular mail, postage pre-paid on January 26, 2015, addressed to its attorneys of record, Robert E. Stepp, Esquire and Bess J. DuRant, Esquire, Sowell Gray Stepp & Laffitte, L.L.C., 1310 Gasden Street, Post Office Box 11449, Columbia, South Carolina 29211.


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