



THE STATE OF SOUTH CAROLINA
In The 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

RECEIVED

JAN 27 2015

SC Court of Appeals

Handwritten notes: 74865, 2nd, 1-31, 3-1

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 January 31, 2015.

This motion is made on the grounds that other obligations and deadlines, including a number of out of state depositions and a South Carolina Supreme Court matter to be heard in early February 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 Monday, March 2, 2015.

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 March 2, 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

West Columbia, SC
January 26, 2015

RECEIVED
JAN 27 2015
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The 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

~~RECEIVED~~
~~JAN 27 2015~~
~~SC Court of Appeals~~

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

v.

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

of whom:

Lydia Miller.....Respondent,

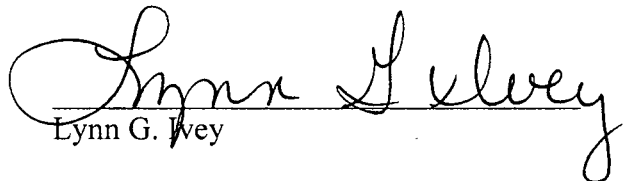
v.

Willie Fields.....Appellant.

PROOF OF SERVICE

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 January 27, 2015, addressed as follows:

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


Lynn G. Ivey

West Columbia, South Carolina
January 27, 2015

January 27, 2015

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

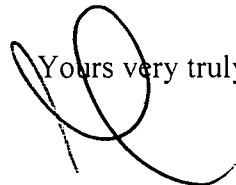
Dear Ms. Kitchings:

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 is also enclosed.

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

RECEIVED

JAN 27 2015

SC Court of Appeals

S. Jahue Moore*
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley*
Sheila McNair Robinson
Robert D. Hazel
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
M. Brooks Biediger
Amber Cary Fulmer
Sarah Taylor Cassidy
Margaret "Meg" Hazel
Billy C. Coleman (Ret.)