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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi Harrington, Circuit Court Judge

Case No. 2011-CP-10-1559

RECEIVED

FEB 12 2015

SC Court of Appeals

15027

Wildflower Nursery, Inc. d/b/a Pleasant Landscapes.....Appellant,

v.

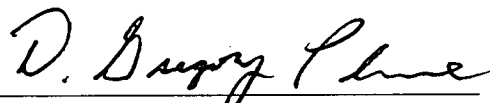
Joseph W. Beasley, Jr. a/k/a Bill Beasley..... Defendant.

NOTICE OF APPEARANCE AND MOTION FOR EXTENSION

Please take notice that Appellant's attorney, Tanya A. Gee, has been elected to the circuit court, and that I, Dennis Gregory Placone, am now representing the Appellant in this matter. Pursuant to Rule 240, SCACR, I respectfully request a 30-day extension to become acquainted with this appeal and to file an Initial Reply Brief.

By the undersigned's calculations, the extension, if granted, would extend the deadline for filing the Return to Monday, March 16, 2015.

Respectfully submitted,



D. Gregory Placone, S.C. Bar #100722
NEXSEN PRUET, LLC
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Columbia, SC 29202
Tel: 803-771-8900
gplacone@nexsenpruet.com

Attorney for Wildflower Nursery, Inc.

February 12, 2015

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Case No. 2011-CP-10-1559

Wildflower Nursery, Inc. d/b/a Pleasant Landscapes.....Appellant,

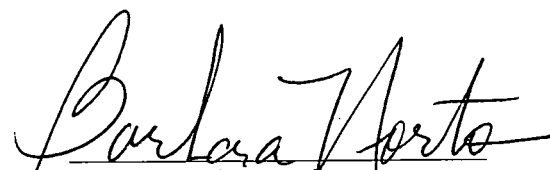
v.

Joseph W. Beasley, Jr. a/k/a Bill Beasley..... Defendant.

PROOF OF SERVICE

I certify that on this 12th day of February, 2015, I have served the foregoing *Notice of Appearance* and *Motion for Extension* via U.S. Mail, first class postage prepaid, on the following counsel of record:

Steven L. Smith
Zachary James Closser
SMITH CLOSSER
P.O. Box 40578
Charleston, SC 29423-0578


Legal Practice Assistant
NEXSEN PRUET, LLC

D. Gregory Placone
Associate
Admitted in SC, FL

February 12, 2015

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SC Court of Appeals

VIA HAND DELIVERY

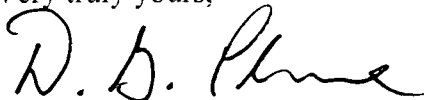
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: Wildflower Nursery, Inc. d/b/a Pleasant Landscapes v. Joseph W.
Beasley, Jr., a/k/a Bill Beasley
Case No. 2011-CP-10-1559

Dear Ms. Kitchings:

Enclosed for filing with the Court, is an original and six (6) copies of the *Notice of Appearance and Motion for Extension* in the above-referenced matter. Kindly file the original with the court and return a time-stamped copy to our courier.

Very truly yours,



D. Gregory Placone, Esq.

DGP/bn
Enclosures

cc: Steven L. Smith, Esquire (w/enc.)
Zachary James Closser, Esquire (w/enc.)

Charleston
Charlotte

Columbia

Greensboro
Greenville

Hilton Head

Myrtle Beach

Raleigh