

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JD Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

75760

Appellate Case No. 2014-002467

Dealer Services Corporation Respondent,

v.

Total, Inc. d/b/a Gault's Used Cars d/b/a Gault's Auto Parts d/b/a Gault's Used Cars and Auto Parts d/b/a Gault's Used Cars and Motormaxx; Edward Keith Potter; Michael Wayne Gault; Christopher Drye d/b/a Drye's Auto Crushing; Ben D. Kochenower, CPA; Automotive Finance Corporation; Grandsouth Bank d/b/a CarBucks; Mason Motors, Inc. d/b/a Mason Ent; American Community Bank, a Division of Yadkin Valley Bank and Trust Company; Quick Capital, LLC d/b/a Quick Capital; and Auto Bank Floor plan, LLC Defendants,

Of whom,

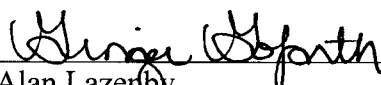
Total, Inc. d/b/a Gault's Used Cars d/b/a Gault's Auto Parts d/b/a Gault's Used Cars and Auto Parts d/b/a Gault's Used Cars and Motormaxx; Edward Keith Potter; Michael Wayne Gault are the Appellants.

**MOTION TO EXTEND TIME TO FILE INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN RECORD ON APPEAL**

Appellants Total, Inc. d/b/a Gault's Used Cars d/b/a Gault's Auto Parts d/b/a Gault's Used Cars and Auto Parts d/b/a Gault's Used Cars and Motormaxx; Edward Keith Potter; Michael Wayne Gault move pursuant to Rule 240, SCACR for an order extending time to file and serve the Initial Brief and Designation of Matter to be Included in Record on Appeal. Appellants

request this extension in order to provide counsel sufficient time to adequately research and prepare these pleadings. Appellants submit that this motion is not interposed for delay. Appellants also request that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

Respectfully submitted,



D. Alan Lazenby
Ginger D. Goforth
LAZENBY LAW FIRM, LLC
PO Box 6099
Spartanburg, SC 29304
(864) 804-5050

ATTORNEYS FOR APPELLANTS

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

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v.

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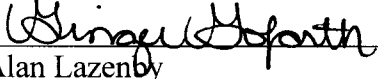
Of whom,

Total, Inc. d/b/a Gault's Used Cars d/b/a Gault's Auto Parts d/b/a Gault's Used Cars and Auto Parts d/b/a Gault's Used Cars and Motormaxx; Edward Keith Potter; Michael Wayne Gault are the Appellants.

PROOF OF SERVICE

I, the undersigned, hereby certify the Motion for Extension of Time in the above referenced matter was mailed, postage prepaid, to Respondent's Attorney, Robert Goings on February 19, 2015 as follows:

Robert F. Goings, Esq.
P.O. Box 436
Columbia, SC 29202


D. Alan Lazenby
Ginger D. Goforth
LAZENBY LAW FIRM, LLC
PO Box 6099
Spartanburg, SC 29304
(864) 804-5050

ATTORNEYS FOR APPELLANTS

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LAZENBY LAW FIRM, LLC
ATTORNEYS AT LAW

SC Court of Appeals

D. ALAN LAZENBY *
GINGER D. GOFORTH

*ALSO LICENSED IN GA

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SPARTANBURG, SC 29302
PHONE: 864-804-5050
FAX: 864-804-5051

February 19, 2015

The Honorable Jenny Abbott Kitchings
SC Court of Appeals Clerk
PO Box 11629
Columbia, SC 29211

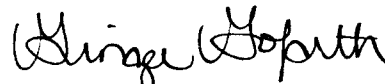
Re: Dealer Services Corporation, Respondent v. Total, Inc. d/b/a Gault's Used Cars d/b/a Gault's Auto Parts d/b/a Gault's Used Cars and Auto Parts d/b/a Gault's Used Cars and Motormaxx; Edward Keith Potter; Michael Wayne Gault; Christopher Drye d/b/a Drye's Auto Crushing; Ben D. Kochenower, CPA; Automotive Finance Corporation; Grandsouth Bank d/b/a CarBucks; Mason Motors, Inc. d/b/a Mason Ent; American Community Bank, a Division of Yadkin Valley Bank and Trust Company; Quick Capital, LLC d/b/a Quick Capital; and Auto Bank Floor plan, LLC, Defendants, Of Whom Total, Inc. d/b/a Gault's Used Cars d/b/a Gault's Auto Parts d/b/a Gault's Used Cars and Auto Parts d/b/a Gault's Used Cars and Motormaxx; Edward Keith Potter; Michael Wayne Gault are the Appellants
In the Court of Common Pleas for Cherokee County
Appellant C.A. No: 2014-002467

Dear Ms. Kitchings:

Enclosed for filing is an original and one copy of a Motion for Extension of Time to file Appellants' Initial Brief and Designation of Matter in the above case. I also include a Proof of Service certifying service of these documents upon Robert Goings, Esq.

Please file the original and send a clocked copy back to me in the envelope I have enclosed for your convenience. I appreciate your assistance in this regard.

Sincerely,



Ginger D. Goforth
ginger@lazenbylawfirm.com

GDG: je

Enclosures

cc: Robert Goings, Esq. (via US Mail)

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PO BOX 6099
SPARTANBURG SC 29304-6099

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THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF COURT FOR COURT OF APPEALS
PO BOX 11629
COLUMBIA SC 29211-1629

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SC Court of Appeals