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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2012-CP-26-3873

**RECEIVED**

FEB 24 2015

**SC Court of Appeals**

Catalina London Limited f/k/a Alea London Limited..... Respondent  
vs.

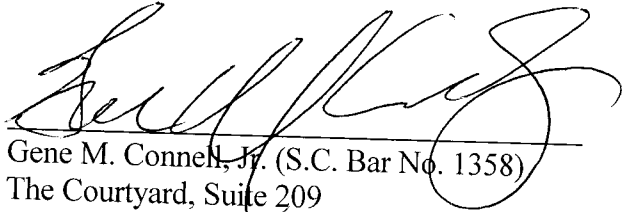
Elisa Narruhn and R.K.C. Entertainment LLC d/b/a The Red Room..... Appellants

MOTION TO EXTEND TIME TO FILE APPELLANTS'  
INITIAL BRIEF AND DESIGNATION OF MATTER


YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants, moves this Court for an Order extending the time to file Appellants' Initial Brief and Designation of Matter in the captioned case. The basis of this Motion is that counsel has a trial commencing on February 23, 2015 and a trial on March 2, 2015 and is unable to complete Appellants' brief.

WHEREFORE, Appellants' counsel respectfully requests this Court issue its Order granting Appellants an additional thirty (30) days to file Appellants' Initial Brief and Designation of Matter, thus extending the time from February 23, 2015 until March 25, 2015.

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)  
The Courtyard, Suite 209  
1500 U. S. Highway 17 North  
Post Office Drawer 14547  
Surfside Beach, South Carolina 29587-4547  
(843) 238-5648 (phone)  
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[gconnell@classactlaw.net](mailto:gconnell@classactlaw.net)  
**Attorney for Appellant**

February  2015  
Surfside Beach, South Carolina

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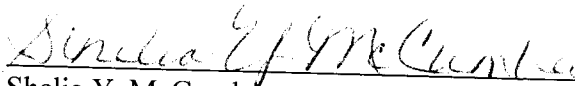
Elisa Narruhn and R.K.C. Entertainment LLC d/b/a The Red Room..... Appellants

PROOF OF SERVICE

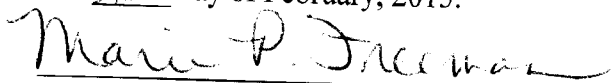
PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served a **Notice of Motion and Motion to Extend Time to File Appellants' Initial Brief and Designation of Matter** on Respondent, through attorney of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

Mark V. Gende, Esquire  
Sweeny Wingate & Barrow, P.A.  
P.O. Box 12129  
Columbia, SC 29211

DATE OF MAILING: February 23, 2015

  
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,  
this 23<sup>rd</sup> day of February, 2015.



Notary Public for South Carolina

My Commission Expires: 6/11/24

**KELAHER, CONNELL & CONNOR, P.C.**

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER\*  
GENE M. CONNELL, JR.  
L. SIDNEY CONNOR, IV  
LISA POE DAVIS

\* OF COUNSEL

AREA CODE 843  
238-5648  
FAX: 238-5050

February 23, 2015

**RECEIVED**

FEB 24 2015

**SC Court of Appeals**

The Honorable Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: *Catalina London Limited f/k/a Alea London Limited v. Elisa Narruhn and R.K.C.  
Entertainment LLC d/b/a The Red Room*  
Case No. 2012-CP-26-3873  
Our File No. 2008-0383C

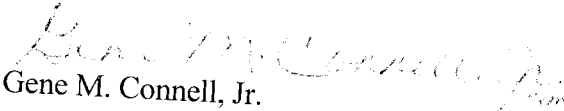
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion to Extend Time to File Appellants' Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,

  
Gene M. Connell, Jr.

GMC,Jr.:sm  
Enclosures

cc: Mark V. Gende, Esquire



**KELAHER, CONNELL & CONNOR, P.C.**  
ATTORNEYS AT LAW  
P. O. DRAWER 14547  
SURFSIDE BEACH, SOUTH CAROLINA 29587

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