

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY
In the Court of Common Pleas

R. Ferrell Cothran, Jr., Presiding Judge

Appellate Case No. 2014-001903

RECEIVED

FEB 24 2015

SC Court of Appeals

75170

Milton Oakley Dickson,.....Appellant,

v.

Arthur B. Beasley, Jr.,.....Respondent,

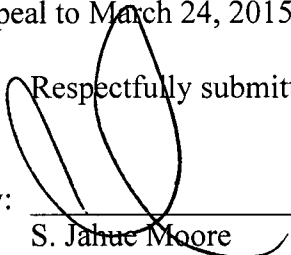
MOTION FOR EXTENSION OF TIME TO FILE RECORD ON APPEAL

The undersigned, as counsel for Appellant Milton Oakley Dickson, hereby moves for a Twenty (20) day extension of time to file its Record on Appeal. This Motion is made on the grounds that John C. Bradley, Jr., the undersigned counsel for Appellant Milton Oakley Dickson, has an unusually heavy workload this month including two other Court of Appeal matters requiring briefs, a matter before The South Carolina Supreme Court, and out of state depositions. This is the first extension request for the Record on Appeal and 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 calculations, the extension, if granted, would extend Appellant's deadline for filing the Record on Appeal to Tuesday, March 24, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Record on Appeal to March 24, 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
Milton Oakley Dickson

West Columbia, SC
February 24, 2015

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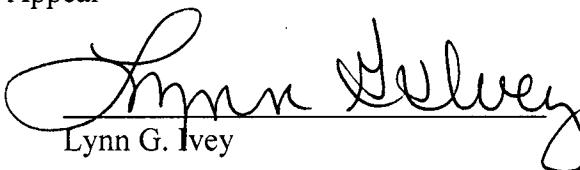
Arthur B. Beasley, Jr.,.....Respondent,

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below Motion for Extension of Time to File Appellant's Record on Appeal upon counsel of record, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, addressed as listed below.

Kenneth R. Young, Jr., Esquire
YOUNG, KEFFER & ASSOCIATES, P.A.
23 West Calhoun Street
Sumter, SC 29150

DOCUMENT(S): 1. Motion for Extension of Time to File Appellant's Record on Appeal


Lynn G. Ivey

West Columbia, South Carolina
February 24, 2015

February 24, 2015

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
P.O. Box 11629
Columbia, SC 2921
VIA HAND DELIVERY

RE: Milton Oakley Dickson v. Arthur B. Beasley, Jr
Appellate Case No. 2004-001903

Dear Ms. Kitchings:

I trust this letter finds you well. Our office represents the Appellant in the above-captioned appeal. Please find enclosed our Motion for Extension to File Record on Appeal. Due to my being out of state for depositions, as well as an unusually active caseload, I am respectfully requesting a twenty day extension. The original and six copies of our motion are provided. Please return the clocked copies to my courier.

By copy of this letter, I am providing opposing counsel notice of our Motion.

With kindest regards I am,

Respectfully yours,


John C. Bradley, Jr.

/lgi
enclosures
cc: Kenneth R. Young, Jr. Esquire

RECEIVED

FEB 24 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.)