

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
R. Markley Dennis, Jr., Circuit Court Judge

75375

Case No. 2011-CP-08-2814
Appellate Case No. 2014-002393

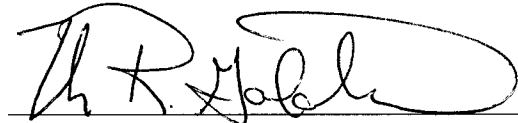
Todd Olds..... Plaintiff,
vs.
City of Goose Creek Respondent,
of whom
Todd Olds is the..... Appellant.

MOTION FOR 30-DAY EXTENSION

The appellant moves for an order of the Court granting a thirty (30) day extension. This request is based on the attorney for Appellant being under a heavy case load and having recently been out of the office due to an on-going illness.

March 13, 2015

Other counsel of Record:
Timothy A. Domin, Esq.
Clawson & Staubes, LLC
126 Seven Farms Drive (Suite 200)
Daniel Island, S. C. 29492

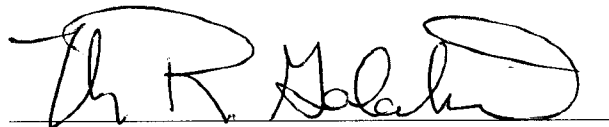


Thomas R. Goldstein, #2186.
Belk, Cobb, Infinger & Goldstein, P.A.
Attorneys for Respondent
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N. Charleston, South Carolina 29415-1121
(843) 554-4291; (843) 554-5566 (fax)
E-mail: tgoldstein@cobblaw.net

CONSULTATION

I certify that prior to filing this motion, I consulted with opposing counsel who does not oppose the request for a thirty day extension.

March 13, 2015



Thomas R. Goldstein

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Todd Olds..... Plaintiff,

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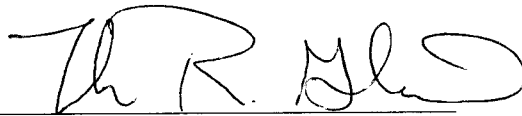
of whom

Todd Olds is the..... Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the Respondent, City of Goose Creek, by depositing a copy of it in the United States Mail, postage prepaid, on March 13, 2015, addressed to its attorney of record, Timothy A. Domin, 126 Seven Farms Drive, Suite 200, Daniel Island, S. C. 29492.

March 13, 2015



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March 13, 2015

Hon. Jenny Abbott Kitchings
Clerk of Court,
South Carolina Court of Appeals
P. O. Box 11629
Columbia, S. C. 29211

Re: Todd Olds vs. City of Goose Creek, Appellate Case No.: 2014-002393

Dear Ms. Kitchings,

The Appellant's Initial Brief is due on March 16, 2015. Due to a heavy case load combined with a recent and on-going illness, I am requesting a 30-day extension. Because this is my second request, I have enclosed a formal Motion for Extension and our firm's check in the amount of \$25.00 for the filing fee. Prior to filing this motion, I consulted with opposing counsel who does not object to my request. I ask that you please file the motion with the Court and return a filed copy to me in the envelope provided. This extension will make the Initial Brief due on or before Wednesday, April 15, 2015. I appreciate any consideration the Court can extend to me. By copy of this letter, I am sending a copy of my motion to opposing counsel. With kind regards, I am

Very truly yours,
BELK, COBB, INFINGER & GOLDSTEIN, P.A.



Thomas R. Goldstein

TRG/ral

enclosure: Motion, return envelope, Check # 16635

cc: Tim Domin, Esq.
Todd Olds

RECEIVED

MAR 17 2015

SC Court of Appeals



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0004690887 MAR 13 2015
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First Class Mail

Belk Cobb Infinger & Goldstein, P.A.
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Hon. Jenny Abbott Kitchings
Clerk of Court,
South Carolina Court of Appeals
P. O. Box 11629
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