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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 06 2015

SC Court of Appeals

APPEAL FROM LEE COUNTY
Court of Common Pleas

Walter Newman, Special Referee

Appellate Case No. 2015-000498

A&P Enterprises, LLC,..... Appellant,

v.

SP Grocery of Lynchburg, LLC and Suresh "Sam" Patel Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL
BRIEF AND DESIGNATION OF MATTER**

The undersigned, as counsel for Appellant A&P Enterprises, LLC, hereby moves for a Thirty (30) day extension of time to file its Initial Brief(s) and Designation of Matter. This Motion is made on the grounds that John C. Bradley, Jr., the undersigned counsel for Appellant A&P Enterprises, LLC will be out of the state on personal vacation beginning Saturday, March 28th and because of this vacation, as well as a very active caseload, additional time is needed to prepare and file the Initial Brief(s) and Designation of Matter. This extension request 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 initial brief and designation of matter to Monday, May 11, 2015. Appellant will not

request any additional time to prepare and file its Initial Brief and Designation of Matter beyond that date.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Initial Brief(s) and Designation of Matter to May 11, 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
A&P Enterprises, LLC

West Columbia, SC
April 6, 2015

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A&P Enterprises, LLC,..... Appellant,

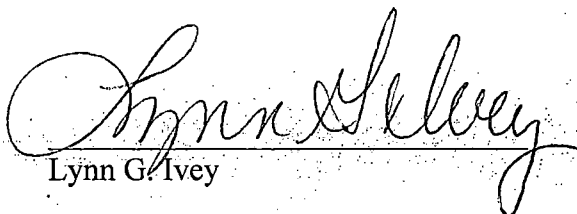
v.

SP Grocery of Lynchburg, LLC and Suresh "Sam" Patel..... Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter on counsel of record for Respondent in this action by depositing a copy of same in the United States Mail, postage prepaid, on April 6, 2015, addressed as follows:

William Wheeler, III
Jennings & Jennings, P.A.
Post Office Box 106
Bishopville, SC 29010-0106


Lynn G. Ivey

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SC Court of Appeals

April 6, 2015

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

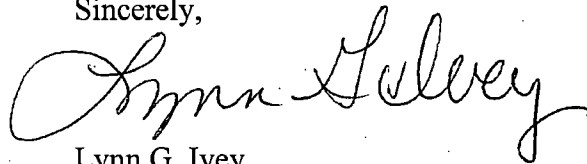
Re: A&P Enterprises, LLC vs. SP Grocery of Lynchburg, LLC, Payal
Suresh Patel, and Suresh "Sam" Patel
C/A No. 2013-CP-31-00194

Dear Ms. Kitchings:

Enclosed for filing is the original and two copies of our motion to extend time to file initial brief and designation of matter in the above referenced matter. Also enclosed is our firm check for \$25.00 for the filing fee.

By cover of this letter, we are serving notice of our motion to opposing counsel.

Sincerely,



Lynn G. Ivey

Enclosures

cc: William Wheeler, III, Esquire

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.)