

75631

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2014-002201
Case No. 2013-CP-23-00179

RECEIVED
APR 09 2015
SC Court of Appeals

Senor Wraps, Inc.,.....Appellant-Respondent,

v.

E. Kwang Kim, as trustee of
the E. Kwang Kim Revocable Trust
dated January 5, 2007, and E. Kwang Kim,.....Respondents-Appellants.

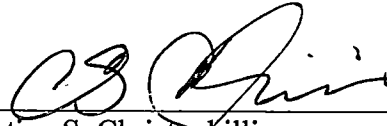
**MOTION FOR AN EXTENSION TO FILE APPELLANT-RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant-Respondent, Senor Wraps, Inc., moves for a thirty (30) day extension in which to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This motion is made on the grounds that, due to the undersigned counsel's trial schedule and work load, additional time is needed to prepare and file the Initial Brief and Designation of Matter. This is Appellant-Respondent's first request for an extension and is based on good cause and not intended for purposes of delay, nor will the requested extension prejudice the rights of any party.

By the undersigned's calculations the extension, if granted, would extend the deadline for filing the Initial Brief and Designation of Matter to the 11th day of May, 2015.

Respectfully submitted,

April 8, 2015



Constantine S. Christophillis
201 Whitsett Street
Greenville, South Carolina 29601
(864) 232-6565
Attorney for Appellant-Respondent

Other Counsel of Record:

Joseph W. Rohe

Kurt M. Rozelsky

William B. Swent

Smith Moore Leatherwood

2 West Washington Street, Suite 1100

Greenville, South Carolina 29601

(864) 751-7668

Attorneys for Respondents-Appellants

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2014-002201
Case No. 2013-CP-23-00179

RECEIVED
APR 09 2015
SC Court of Appeals

Senor Wraps, Inc.,.....Appellant-Respondent,

v.

E. Kwang Kim, as trustee of
the E. Kwang Kim Revocable Trust
dated January 5, 2007, and E. Kwang Kim,.....Respondents-Appellants.

PROOF OF SERVICE

I certify that I have served the foregoing Motion for Extension of Time on Respondents-Appellants in the above matter by depositing a copy of same in the United States mail, postage prepaid, on April 8, 2015, addressed to their attorneys of record:



Constantine S. Christophillis
201 Whitsett Street
Greenville, South Carolina 29601
(864) 232-6565
Attorney for Appellant-Respondent

CONSTANTINE S. CHRISTOPHILLIS

ATTORNEY AT LAW, P.A.
201 WHITSETT STREET
GREENVILLE, SOUTH CAROLINA 29601

Phone: (864) 232-6565
Fax: (864) 242-6251
Email: cschristophillis@bellsouth.net

April 8, 2015

RECEIVED
APR 09 2015
SC Court of Appeals

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

Re: *Senor Wraps, Inc., v. E. Kwang Kim, as trustee of the E. Kwang Kim Revocable Trust dated January 5, 2007, and E. Kwang Kim*
Appellate Case No. 2014-002201
Civil Action No. 2013-CP-23-00179

Dear Ms. Kitchings:

On behalf of my client, Senor Wraps, Inc., I enclose herewith in the above matter the following for filing:

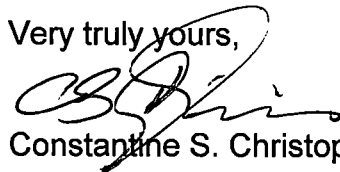
1. Motion for an Extension to File Appellant-Respondent's Initial Brief and Designation of Matter.
2. Proof of Service of said Motion on counsel for Respondents-Appellants.
3. Check for \$25.00 for filing fee.

I also enclose a copy of the above documents and request that you clock-in the copies and return them to me in the stamped, self-addressed envelope.

Please call if you need anything else to complete the filing of this Motion.

With kind regards, I remain

Very truly yours,



Constantine S. Christophillis

CSC/plm
Enclosures

Jenny Abbott Kitchings, Clerk of Court
Re: Appellate Case No. 2014-002201
April 8, 2015

Cc: Joseph W. Rohe, Esq.
Kurt M. Rozelsky, Esq.
William B. Swent, Esq.
Smith Moore Leatherwood, LLP
2 W. Washington Street, Suite 1100
Greenville, SC 29601
Attorneys for Respondents-Appellants

Constantine S. Christophillis

Attorney At Law, PA

201 Whitsett Street, Greenville, South Carolina 29601

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

RECEIVED

APR 09 2015

SC Court of Appeals