

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APR 20 2015

SC Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2012-CP-17-00295

Ebony Bethea,

Appellant,

v.

Derrick Jones, John Doe, Individually and as
employee/agent of Citi Trends, Inc., Citi Trends, Inc.,
and Palmetto Properties, Inc., Defendants,

Of whom Citi Trends, Inc., and
Palmetto Properties, Inc. are

Respondents

Appellate Case No. 2014-000332

MOTION FOR CONTINUANCE

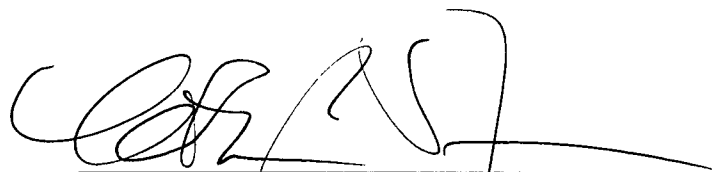
For good cause shown, Respondent, CitiTrends, Inc. by and through their undersigned attorney, moves to continue the hearing for oral argument which has now been set by the court for May 5, 2015 at 10:00 a.m. due to a planned trip to Colorado.

The attorney for the Respondent, CitiTrends Inc., received notice on February 9, 2015 that the above-referenced case was likely to be considered during the term to be held in May of 2015. In that letter, the court asked for the attorneys to present any conflicts that the attorneys had on May 4, 5, 6, 12, 13 and 14, 2015. At that time, the undersigned responded to the court with conflicts which were known on February 23, 2015 and held all other dates to be available

should the case be scheduled in May. Subsequently, the undersigned received a letter from the court stating that the case had appeared on an earlier preliminary list, but was not scheduled for argument in May. The letter communicated that the case would likely be considered during the term in June 2015. The court then asked for conflicts with the hearing dates during June of 2015. The undersigned responded with a letter identifying her conflicts during the June 2015 term. After responding with dates for the June term, the undersigned received a letter on April 10, 2015 that the case would be set for oral argument on May 5, 2015. On Monday, April 6, 2015, the undersigned made reservations to fly to Colorado to assist her daughter to drive from Colorado to South Carolina at the end of her graduate school semester. When the undersigned made these reservations, she was under the mistaken belief that the case was to be set for oral argument in June as was last communicated by the court and that the case was no longer eligible to be scheduled in May. Therefore, the undersigned respectfully requests that the case be continued from May 5, 2015. The undersigned also seeks protection for May 6th and 7th to allow sufficient time to return to South Carolina from Colorado.

Respondent's attorney has consulted with the other attorneys in this case regarding her request for a continuance. The other attorneys consent to the request for a continuance from May 5, 2015.

Respectfully submitted,



Catharine Garbee Griffin
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400 (29204)
Post Office Box 8057
Columbia, South Carolina 29202
(803) 799-9091
Attorneys for Respondent Citi Trends, Inc.

April 20, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APR 20 2015

SC Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Appellate Case No. 2014-000332
Case No. 2012-CP-17-00295

Ebony Bethea,

Appellant,

v.

Derrick Jones, John Doe, Individually and as
employee/agent of Citi Trends, Inc., Citi Trends, Inc.,
and Palmetto Properties, Inc., Defendants,

Of whom Citi Trends, Inc., and
Palmetto Properties, Inc. are

Respondents.

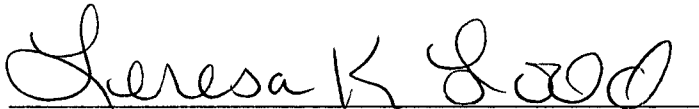
Appellate Case No. 2014-000332

CERTIFICATE OF SERVICE

I, Teresa K. Todd, Legal Assistant to Catharine Garbee Griffin, an employee of Baker, Ravenel & Bender, L.L.P., hereby certify that I have, on the date indicated below, served counsel below with Respondent's Motion for Continuance, by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following address:

Akim A. Anastopoulos, Esquire
Eric M. Poulin, Esquire
Anastopoulos Law Firm, LLC
2557 Ashley Phosphate Road
North Charleston, SC 29418

Sarah Spruill, Esquire
Haynsworth Sinkler Boyd, PA
P. O. Box 2048
Greenville, SC 29602



Teresa K. Todd

April 20, 2015



BAKER RAVENEL BENDER SC Court of Appeals
ATTORNEYS AT LAW

RECEIVED

APR 20 2015

Catharine Garbee Griffin
Direct Dial 803 343 3863
cgriffin@brblegal.com

April 20, 2015

VIA HAND DELIVERY

The Honorable V. Claire Allen
Deputy Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Ebony Bethea, Appellant, v. Derrick Jones, John Doe, individually and as employee/agent of Citi Trends, Inc., Citi Trends, Inc., and Palmetto Properties, Inc., Defendants, of whom Citi Trends, Inc., and Palmetto Properties are Respondents
Appellate Case No. 2014-000332
Claim No. ENH3422
Our File No. 7746.1934

Dear Ms. Allen:

In reviewing your online file regarding the above-referenced case, I noticed this past weekend that my motion for a continuance for the oral argument was not posted on line. I talked with Elizabeth Carter who indicates that the motion had not been received by the court although I mailed it on April 10, 2015. I am now hand delivering a copy of the identical motion which I mailed on April 10, 2015. I ask that you please file a copy of this motion for a continuance. I also am enclosing a \$25 check for the filing. I apologize for the mail delay and cannot explain why it was not delivered after ten days.

By copy of this letter to the other attorneys, I am serving them with a copy of the motion as I previously did on April 10, 2015.

Your assistance in this matter is greatly appreciated.

Yours truly,

Catharine Garbee Griffin
CGG/tkt
Enclosures

Cc: Eric Poulin, Esquire
Roy T. Willey, IV, Esquire
Robert W. Buffington, Esquire
Sarah Spruill, Esquire