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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 20 2015

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
In the Court of Common Pleas
Edgar W. Dickson, Presiding Judge

Case No.: 2012-CP-32-1472
Appellate Case No.: 2014-001154

Lydia Miller and Doris Knight.....Appellants,

v.

Willie Fields, Paula White, and the Refurb Center, nc.....Defendants,

of whom:

Lydia Miller.....Respondent,

v.

Willie Fields.....Appellant.

MOTION FOR EXTENSION

The undersigned, as counsel for Respondent Lydia Miller, hereby moves for a Thirty (30) day extension of time to file its Initial Brief of Respondent. This document is currently due on or before April 22, 2015. Counsel for Appellant sent his Initial Brief on Friday, March 20, 2015. Counsel for Respondent retrieved Initial Brief of Appellant on Monday, March 23, 2015 from the mail. Thus, present document is currently due on or before April 22, 2015.

This motion is made on the grounds that other obligations and deadlines will

prevent the undersigned from completing his Brief and Designation by its current deadline. Namely, the undersigned is scheduled for a bench trial before the Honorable Judge Diane S. Goodstein in Richland County Court of Common Pleas on April 21, 2015 at 10:00 a.m. Additionally; the undersigned is scheduled to appear at depositions in Aiken, SC on April 22, 2015. These depositions will be taken in anticipation for a jury trial in the Barnwell County Court of Common Pleas for the week of May 4, 2015 before the Honorable Diane S. Goodstein.

This extension is not intended for purposes of delay. Further, there would not be any prejudice to the parties by an extension of time as the Counsel for Appellant has received two (2) extensions during the course of this appeal. If, this Court grants this extension, then the Initial Brief of Respondent would be due on May 22, 2015.

The undersigned has not requested an extension in this matter.

WHEREFORE, Respondent respectfully prays that this Court extends the deadline for the service and filing of its Initial Brief to May 22, 2015.

Respectfully submitted,



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Attorney for Respondent

Barnwell, SC
April 20, 2015

Other Counsel of Record:
John C. Bradley, Esquire
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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

SC Court of Appeals

Edgar W. Dickson, Presiding Judge

Case No.: 2012-CP-32-1472
Appellate Case No. 2014-001154

Lydia Miller and Doris Knight.....Plaintiffs.

v.

Willie Fields, Paula White, and The Refurb Center, Inc.....Defendants,

of whom:

Lydia Miller.....Respondent.


v.

Willie Fields.....Appellant.

PROOF OF SERVICE

I certify that I served the Motion for Extension by depositing a copy of it in the United States mail, postage prepaid, on April 20, 2015 addressed to the attorney(s) of record, John C. Bradley, Esquire, Moore Taylor, 1700 Sunset Boulevard, West Columbia, SC 29169.

Columbia, SC
April 20, 2015



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April 20, 2015

Hand-Delivered

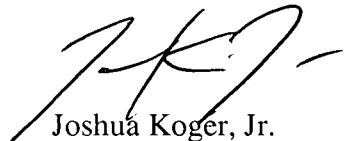
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC

Re: Lydia Miller v. Willie Fields
Appellate Case No.: 2014-001154

Dear Ms. Kitchings:

Enclosed are the original and three (3) copies of Respondent's Motion for Extension in the above-referenced matter for filing. Additionally, I am serving opposing counsel with a copy of this letter and the Motion.

Sincerely,



Joshua Koger, Jr.

JKJ

Enclosures

Cc: John C. Bradley, Esquire

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