

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

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Appellate Case No. 2015-000733

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**RECEIVED**  
APR 27 2015  
SC Court of Appeals

Kan Enterprises, Inc., d/b/a A 1 Food Stores, ..... Appellant,

v.

South Carolina Department of Revenue, Ellen Fishburne Triplett,  
Keith McIver, Samuel L. Munson, Jocelyn Munson, and Michael Hill, ..... Respondents.

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

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The undersigned, as counsel for Appellant Kan Enterprises, Inc., d/b/a A 1 Food Stores, hereby moves for a Thirty (30) day extension of time to file its Initial Brief and Designation of Matter. This Motion is made on the grounds that John C. Bradley, Jr., the undersigned counsel for Appellant Kan Enterprises, Inc., d/b/a A 1 Food Stores, has an unusually heavy workload including four other Court of Appeal matters requiring briefs, a date certain trial on June 1<sup>st</sup> in the Court of Common Pleas with out of state depositions, and is preparing to present at a May conference in Phoenix, AZ.

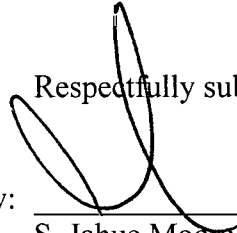
This is the first extension request for the Initial Brief and Designation of Matter and is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations, the extension, if granted, would extend Appellant's deadline for filing the Initial Brief and Designation of

Matter to Monday, June 8, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Initial Brief and Designation of Matter to Monday, June 8, 2015.

Respectfully submitted,

By:



S. Jahue Moore  
John C. Bradley, Jr.  
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(803) 748-8452  
ATTORNEYS FOR APPELLANT

West Columbia, South Carolina

April 27, 2015

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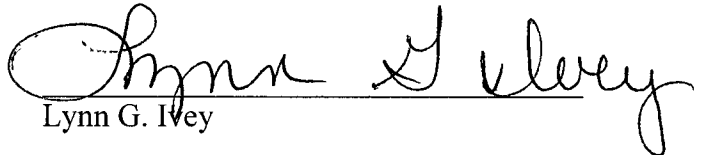
**PROOF OF SERVICE**

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I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served the Motion for Extension of Time to File Initial Brief and Designation of Matter by mail, to the following parties by depositing a copy of same in the United States Mail, postage prepaid, on April 27, 2015, addressed as follows:

Justine M. Tate, Esquire  
Sean Ryan, Esquire  
Counsel for Litigation  
SC Department of Revenue  
P.O. Box 12265  
Columbia, SC 29211

Kathleen McDaniel, Esquire  
Callison Tighe & Robinson, LLC  
PO Box 1390  
Columbia, SC 29202-1390

  
Lynn G. Ivey

West Columbia, South Carolina

April 27, 2015



S. Jahue Moore\*  
 J. Mark Taylor\*  
 C. Vance Stricklin, Jr.  
 James Edward Bradley†  
 Sherla 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.)

April 27, 2015

The Honorable Jenny Abbott Kitchings  
 Court of Appeals Clerk of Court  
 P.O. Box 11629  
 Columbia, SC 2921

RE: Kan Enterprises, Inc., d/b/a A1 Food Stores v. SC Department of  
 Revenue, et al  
 Appellant No. 2015-000733

Dear Ms. Kitchings:

Please find attached to this letter the original and three copies of our Motion for Extension of Time with Proof of Service, and our check for \$25.00. Please return the clocked copies via our courier.

By copy of this letter, we are serving opposing counsel of the same.

Thank you for your assistance with this matter.

Respectfully yours,

Lynn G. Ivey  
 Assistant to John C. Bradley, Jr.

Enclosures

cc: Justine M. Tate, Esquire  
 Sean Ryan, Esquire  
 Kathleen McDaniel, Esquire

**RECEIVED**

APR 27 2015

**SC Court of Appeals**

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