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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

APR 14 2015

Kristi Harrington, Circuit Court Judge

**SC Court of Appeals**

Case No. 2011-CP-10-1559

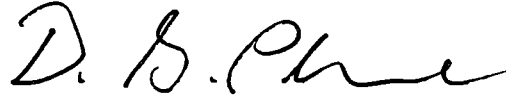
Wildflower Nursery, Inc. d/b/a Pleasant Landscapes.....Appellant,  
v.  
Joseph W. Beasley, Jr. a/k/a Bill Beasley.....Respondent.

**MOTION FOR EXTENSION**

Appellant respectfully requests a 10-day extension to complete the Record on Appeal, pursuant to SCACR 240. Present counsel for Appellant noticed his appearance shortly before the Initial Reply Brief was filed in this Appeal, as previous counsel for Appellant was elected to the judiciary. While compiling the Record on Appeal, current counsel for Appellant discovered that some items, previously believed to be in the file, were in fact missing. In order to fully comply with the requirements of SCACR 210, counsel for Appellant requests this extension to both locate all necessary items listed in both parties' Designation of Matter and to correctly prepare them to comport with the requirements of SCACR 210. Appellant's counsel conferred with Respondent's counsel on April 14, 2015 regarding this Motion for Extension, where the underlying circumstances were explained. Respondent's counsel provided *consent* to the requested extension.

By the undersigned's calculations, the extension, if granted, would extend the deadline for filing the Record on Appeal to April 24, 2015.

Respectfully submitted,



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D. Gregory Placone  
NEXSEN PRUET, LLC  
Post Office Drawer 2426  
Columbia, SC 29202  
Tel: 803-771-8900

*Attorney for Wildflower Nursery, Inc.*

April 14, 2015

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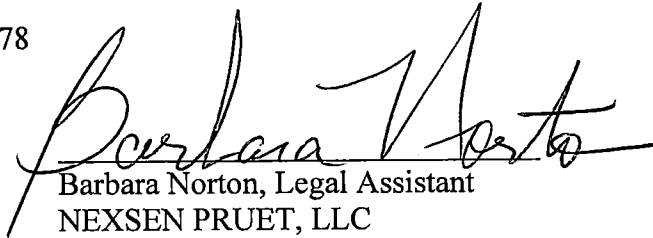
v.

Joseph W. Beasley, Jr. a/k/a Bill Beasley.....Respondent.

**PROOF OF SERVICE**

I certify that on this 14<sup>th</sup> day of April, 2015, I have served the foregoing **Motion for Extension of Time** via U.S. Mail, first class postage prepaid, on the following counsel of record:

Steven L. Smith  
Zachary James Closser  
**SMITH CLOSSER**  
P.O. Box 40578  
Charleston, SC 29423-0578



Barbara Norton, Legal Assistant  
NEXSEN PRUET, LLC  
1230 Main Street, Suite 700 (29201)  
P.O. Drawer 2426  
Columbia, SC 29202

# NEXSEN | PRUET

**D. Gregory Placone**  
Associate  
Admitted in SC, FL

April 14, 2015

**VIA HAND DELIVERY**

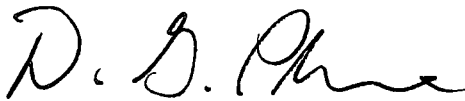
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

**Re: Wildflower Nursery, Inc., d/b/a Pleasant Landscapes vs. Joseph  
W. Beasley, Jr., a/k/a Bill Beasley  
Case No.: 2011-CP-10-1559**

Dear Ms. Kitchings:

Enclosed herewith for filing with the Court is an original and 2 copies of the ***Motion for Extension of Time*** in the above referenced matter. Please return a stamped copy to me via our courier. Also enclosed is a check in the amount of \$25 for the filing fee as well as the ***Proof of Service*** reflecting that counsel of record has been served with a copy of the same.

Very truly yours,



D. Gregory Placone

DGP/bn

Enclosures

cc w/encl.: Steven L. Smith, Esquire  
Zachary James Closser, Esquire

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**Attorneys and Counselors at Law**

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SC Court of Appeals