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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

MAY 15 2015

J. Ernest Kinard, Jr., Circuit Court Judge **SC Court of Appeals**

Appellate Case No. 2014-002733

Samuel Washington, Jr., Respondent,

v.

South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a Emerson
Network Power, and/or Emerson Network Power, Defendants,


Of Whom South Carolina Electric and Gas Company is the Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

NOW COMES counsel for Respondent Samuel Washington, Jr. and moves this
Honorable Court for a thirty (30) day extension of time to file Respondent's Initial Brief and
Designation of Matter to be Included in the Record on Appeal. Counsel submits as justification
for this request that this is Respondent's first request for an extension and counsel for the
Appellant and Emerson Electric Company consent to this extension.

Accordingly, Respondent asks that the Court enter an Order extending the time for filing
Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal by
thirty (30) days, to July 1, 2015.

May 13, 2015.



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ATTORNEYS FOR RESPONDENT

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PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal on Appellant South Carolina Electric and Gas Company by depositing a copy of it in the United States Mail, postage prepaid, on May 13, 2015, addressed to its attorneys of record, John A. Massalon and I. Ryan Neville, Wills Massalon & Allen, LLC, Post Office Box 859, Charleston, South Carolina 29402, and that the same was served on Defendant Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power by depositing a copy of it in the United States Mail, postage prepaid, on May 13, 2015, addressed to its attorneys of record, H. Michael Bowers, Smith Moore Leatherwood, LLP, 25 Calhoun Street, Suite 250, Charleston, South Carolina 29401.

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