

76074

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2012-CP-26-3873

RECEIVED
MAY 18 2015
SC Court of Appeals

Catalina London Limited f/k/a Alea London Limited..... Respondent

vs.

Elisa Narruhn and R.K.C. Entertainment LLC d/b/a The Red Room..... Appellants

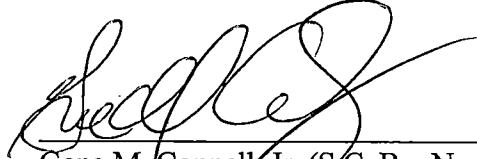
NOTICE OF MOTION AND MOTION TO EXTEND TIME
TO SERVE AND FILE RECORD ON APPEAL

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants, moves this Court for an Order extending the time to serve and file the Record on Appeal in the captioned case. The basis of counsel's request is that the current deadline for service of the Record on Appeal on Respondent is May 18, 2015 and counsel's schedule, including preparing for a trial in circuit court, has delayed preparation of the Record on Appeal for timely service on Respondent.

WHEREFORE, Appellants' counsel respectfully requests this Court issue its Order granting Appellants an additional thirty (30) days for service and filing of the Record on Appeal.

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
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gconnell@classactlaw.net
Attorney for Appellant

May 15, 2015
Surfside Beach, South Carolina

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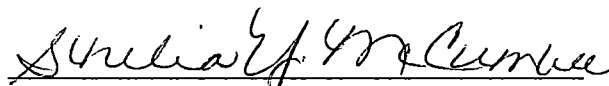
Elisa Narruhn and R.K.C. Entertainment LLC d/b/a The Red Room..... Appellants

PROOF OF SERVICE

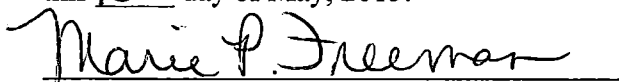
PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served a **Notice of Motion and Motion to Extend Time to Serve and File Record on Appeal** on Respondent, through attorney of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

Mark V. Gende, Esquire
Sweeny Wingate & Barrow, P.A.
P.O. Box 12129
Columbia, SC 29211

DATE OF MAILING: May 15, 2015


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 15th day of May, 2015.


Notary Public for South Carolina
My Commission Expires: 6/11/24

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
* OF COUNSEL

AREA CODE 843

238-5648

Fax: 238-5050

RECEIVED

MAY 18 2015

SC Court of Appeals

May 15, 2015

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *Catalina London Limited f/k/a Alea London Limited v. Elisa Narruhn and R.K.C.
Entertainment LLC d/b/a The Red Room*
Case No. 2012-CP-26-3873
Our File No. 2008-0383C

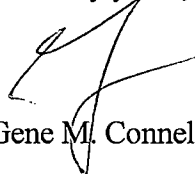
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Notice of Motion and Motion to Extend Time to Serve and File Record on Appeal and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc: Mark V. Gende, Esquire



KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 14547
SURFSIDE BEACH, SOUTH CAROLINA 29587

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