

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 12 2015

SC Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

Case No. 2012-CP-26-9843

Amanda Gonzalez, individually and as the Administratrix of The Estate  
of Angelo Luis Gonzalez and Susan Jo Reader ..... Appellant,

v.

Michael Allen Hilton and VIP of Myrtle Beach, Inc., a South Carolina  
Corporation ..... Respondent.

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

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Counsel for the Appellants hereby respectfully moves before this Court, pursuant to Rule 240(a), SCACR, for a sixty (60) day extension of time to file the Initial Brief and Designation of Matter to be included in the Record on Appeal. The Appellants' Initial Brief is currently due on or before June 19, 2015, and counsel has not previously requested an extension.

Appellants' undersigned counsel is currently in extended settlement negotiations

which, if successful, must be concluded on or before July 27, 2015. Appellants contend, therefore, that good cause exists for an extension of time to file their Initial Brief and Designation of Matter be included in the Record on Appeal.

WHEREFORE, Appellants contend that this Appeal and the interests of justice will be served by granting Appellants a sixty (60) day extension of time within which to file their Initial Brief and Designation of Matter to be included in the Record on Appeal.

Accordingly, Appellants request the court to enter an order Enlarging the Time up to and including August 19, 2015, to submit their Initial Brief and Designation of Matter to be included in the Record on Appeal.

Respectfully submitted:

THE BREHN LAW FIRM



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AND

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June 10, 2015  
Conway, South Carolina

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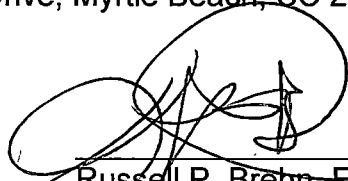
v.

Michael Allen Hilton and VIP of Myrtle Beach, Inc., a South Carolina  
Corporation ..... Respondent.

**PROOF OF SERVICE  
(Notice of Appeal)**

I certify I have served the Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter on Michael Allen Hilton and VIP of Myrtle Beach, Inc., a South Carolina Corporation, Respondents, by depositing a copy of it in the United States Mail, postage prepaid, on June 10, 2015, addressed to his / its attorney of record, Thomas C. Brittain, Esq., 4614 Oleander Drive, Myrtle Beach, SC 29577.

June 10, 2015



Russell P. Brehm, Esq.  
1108 Third Avenue  
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Phone 843 / 488-3500  
Attorney for Appellants

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Email: rbrehn@brehnlaw.com

June 9, 2015

The Hon. Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: ***Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter Amanda Gonzalez, Individually and as Administratrix of the Estate of Angelo Gonzalez, and Susan J. Reader v. Michael Allen Hilton and VIP of Myrtle Beach, Inc., a South Carolina Corporation,***

Dear Mrs. Abbott-Kitchings:

Enclosed for filing is *Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter* in the above case. Also enclosed are the following:

- (1) Proof of Service of this *Motion* on Respondents;
- (2) Six (6) copies of the *Motion*;
- (3) Filing fee of \$ 25.00.

I would appreciate your staff clocking this *Motion* and returning a copy to me in the stamped, self-addressed envelope I have enclosed for that purpose.

Thank you for your attention and cooperation in this matter. With kindest regards, I am With warmest regards, I remain

Very truly yours,

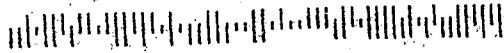
A handwritten signature in black ink, enclosed in a large, loopy circle. The signature appears to be "Russell P. Brehn".

Russell P. Brehn

RPB/dr  
Enclosures (9)

cc: Thomas C. Brittain, Esq.  
4614 Oleander Drive; Myrtle Beach, SC 29577  
Attorney for Respondents

Ilan Wexler, Esq.  
21 N. Wycliffe Circle; Youngstown, OH 44515  
Co-Counsel for Appellants



*The Brehn Law Firm  
1108 Third Avenue  
Conway, SC 29526*

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