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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM LEXINGTON COUNTY
In the Court of Common Pleas

JUN 22 2015

SC Court of Appeals

Edgar W. Dickson, Presiding Judge

Case No. 2012-CP-32-1472
Appellate Case No. 2014-001154

Lydia Miller and Doris Knight.....Plaintiffs,

v.

Willie Fields, Paula White, and The Refurb Center, Inc.....Defendants,

of whom:

Lydia Miller.....Respondent,

v.

Willie Fields.....Appellant.

MOTION FOR EXTENSION

The undersigned, as counsel for Appellant Willie Fields, hereby moves for a Ten (10) day extension of time to file its Reply Brief. These documents are currently due on or before June 22, 2015.


As outlined in previous correspondence with the Court, there has been confusion and questions regarding completeness and proper service of Respondent's Initial Brief and Designation of Matter. Two previous extensions were requested because Appellant's copy of the Respondent's Initial Brief was sent to the Court, and then the Respondent's Designation of Matter was not filed with their Initial Brief. The resulting questions have

now been addressed by the Court. However, clarification was received while counsel was out of town due to a deposition, followed by a vacation.

This extension request 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 calculation, the extension, if granted, would extend Appellant's deadline for filing the Reply Brief to July 2, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of its Reply Brief to July 2, 2015.

Respectfully submitted,

By:  _____
S. Jahue Moore
John C. Bradley, Jr.
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Attorneys for Appellant

West Columbia, SC
June 22, 2015

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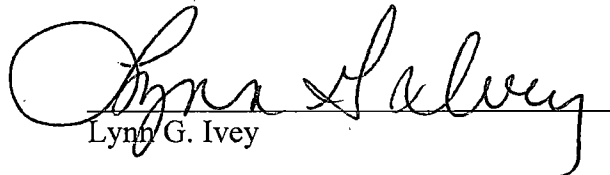
v.

Willie Fields.....Appellant.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served Appellant's Motion for Extension on counsel of record for Respondent in this action by depositing a copy of same in the United States Mail, postage prepaid, on June 22, 2015 addressed as follows:

Joshua Koger, Jr., Esquire
Koger Law Firm
P.O. Box 393
Barnwell, SC 29812


Lynn G. Ivey

West Columbia, South Carolina
June 22, 2015



June 22, 2015

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

RE: Lydia Miller v. Willie Fields
Appellate Case No. 2014-001154

Dear Ms. Kitchings:

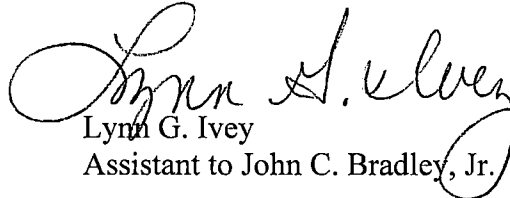
Enclosed please find the original and three copies of Appellant's Motion for Extension in the above referenced matter. A check for \$25.00 for filing the motion is also enclosed.

Please file the original and return the extra copies to my courier. Under cover of this letter I am serving counsel for the opposing party with the same.

If you have any questions, please do not hesitate to contact me.

With kindest regards, I am,

Yours very truly,



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

Enclosures

cc: Joshua Koger, Jr. Esquire

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SC Court of Appeals

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