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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Case. No. 2012-CP-32-3428

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JUN 22 2015

SC Court of Appeals

James Spencer, individually and on behalf of the
Estate of Doris Holt and on behalf of Southern
Holdings, Inc., Plaintiffs,

Of whom James Spencer is the

Appellant,

v.

John R. Rakowsky, Adrian L. Falgione,
and The Law Offices of Adrian Falgione, LLC,
Defendants,

Of whom John R. Rakowsky and
Adrian L. Falgione are the

Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Respondent John R. Rakowsky respectfully requests a 30-day extension of the deadline for filing and serving the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal. This is Respondent Rakowsky's first request for an extension of this deadline. The current deadline is June 26, 2015. The new deadline with a 30-day extension would be July 27, 2015.

[SIGNATURE PAGE FOLLOWS]

This 10th day of June, 2015.

Respectfully submitted,

CARLOCK, COPELAND & STAIR, LLP

By: 

DAVID W. OVERSTREET
State Bar No.: 16965

MICHAEL B. McCALL
State Bar No.: 73028

Attorneys for Respondent John R. Rakowsky

40 Calhoun Street, Suite 400
Charleston, SC 29401-3531
843-727-0307

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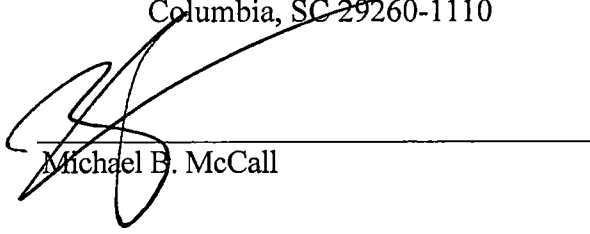
Respondents.

PROOF OF SERVICE

I certify that on June _____, 2015, I served Respondent John R. Rakowsky's *Motion for Extension* on *pro se* parties and counsel of record by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

James Spencer
7001 Saint Andrews Road
Suite 183
Columbia, SC 29212

Warren C. Powell, Jr.,
Benjamin C. Bruner, Esq.
Bruner, Powell, Wall & Mullins, LLC
P.O. Box 61110
Columbia, SC 29260-1110


Michael B. McCall

LAW OFFICES

CARLOCK, COPELAND & STAIR, LLP

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REPLY TO SC OFFICE

June 18, 2015

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

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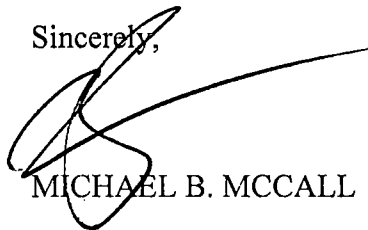
SC Court of Appeals

Re: James Spencer v. John R. Rakowsky, *et al.*
Case No.: 2014-000091
CCS File No.: 2283-35025

Dear Ms. Kitchings:

Enclosed for filing, please find the original and 6 copies of Respondent John R. Rakowsky's Motion for Extension and Proof of Service, in this case, as well as a check for the filing fee of \$25.00. By copy of this correspondence, I am serving a copy of the same upon the Appellant and all counsel of record. If you have any questions, please do not hesitate to contact me. With kind regards, I am

Sincerely,

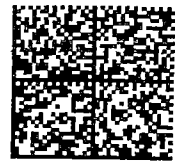
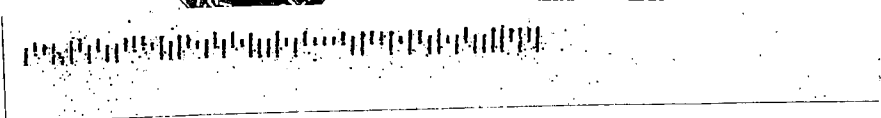


MICHAEL B. MCCALL

MBM:tmm
Enclosures

cc: James Spencer
Benjamin C. Bruner, Esq.
Warren C. Powell, Esq.
Michael Sribnick, Esq.

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South Carolina Court of Appeals
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