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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Steven H. John, Circuit Court Judge

Case No. 2008-CP-26-7586

**RECEIVED**

**JUN 23 2015**

**SC Court of Appeals**

Anita Bacchi and  
Kristine Lomas,

Respondents,

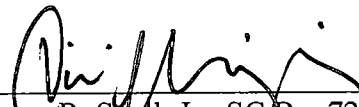
v.

America's Source Consulting  
Agency, LLC,

Appellant.

**MOTION FOR EXENSION**

The Appellant hereby moves for a thirty (30) day extension of time by which to file and serve the Initial Brief of the Appellant and the Designation of Matter to be included in the record on appeal. The Initial Brief and Designation of the Appellant is currently due to be filed and served by June 29, 2015, thirty day following receipt of the transcript, pursuant to SCACR Rule 208(a)(1). The Appellant respectfully requests an extension through July 22, 2015, thirty (30) days from the date of this motion, pursuant to SCACR Rule 240.

  
James R. Snell, Jr., SC Bar 72663  
Vicki Koutsogiannis, SC Bar 101782  
Law Office of James R. Snell, Jr., LLC  
316 South Lake Drive  
Lexington, South Carolina 29072  
(803) 359-3301  
Attorneys for the Appellant

Lexington, South Carolina  
June 22, 2015

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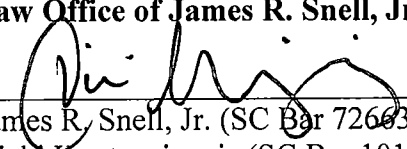
**PROOF OF SERVICE**

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I, Vicki Koutsogiannis, an employee of the Law Office of James R. Snell, Jr., LLC, hereby certify that I have served the Appellant's Motion for Extension on the Respondents in this case, through their Attorney James Marshall Biddle, by depositing a copy of the same in the United States Mail, postage prepaid, on June 22, 2015, addressed to the following:

**James Marshall Biddle, Esq.**  
**Post Office Box 50460**  
**Myrtle Beach, South Carolina 29579**

**Law Office of James R. Snell, Jr., LLC**

  
James R. Snell, Jr. (SC Bar 72663)  
Vicki Koutsogiannis (SC Bar 101782)  
316 South Lake Drive  
Lexington, South Carolina 29072  
T: (803) 359-3301  
F: (803) 359-7691  
Attorneys for Appellant

June 22, 2015  
Lexington, South Carolina

Law Office Of

**JAMES R. SNELL, JR., LLC**

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June 22, 2015

SC Court of Appeals

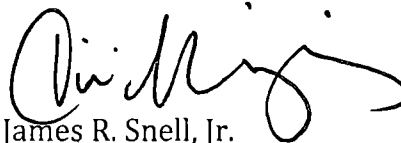
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**Re: Anita Bacchi and Kristine Lomas vs. America's Source Consulting Agency, LLC and Sergey Sokolovsky**  
**Civil Action No.: 2008-CP-26-7586**  
**Appellate Case No.: 2015-000670**

Dear Mrs. Kitchings:

Please be advised that we represent the Appellant Sergey Sokolovsky in the above-referenced matter. Our office received the transcript in this case from Dixie Cox Eubanks on May 29, 2015. We respectfully ask fo a thirty day continuance to file the Initial Brief and Designation of Matter to be included in the record on appeal. Please see enclosed Motion for Extension and Proof of Service on the Respondent, along with six copies for the court. Please contact our office should you have any questions or concerns. Thank you very much for your assistance.

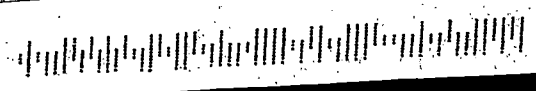
Sincerely,



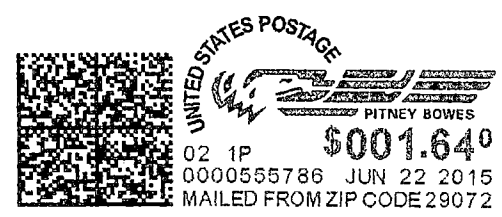
James R. Snell, Jr.  
Vicki Koutsogiannis  
Attorneys for the Appellant

Enclosures

cc: James Marshall Biddle, Esq.



*Law Office Of*  
**JAMES R. SNELL, JR., LLC**  
316 South Lake Drive  
Lexington, South Carolina 29072



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JUN 23 2015  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
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