

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE LEXINGTON COUNTY  
Court Of Common Pleas

Frank R. Addy, Circuit Court Judge

APPELLATE CASE NO.: 2014-000091

RECEIVED  
JUN 24 2015  
SC Court of Appeals

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

Of whom James Spencer is the Appellant, 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 TO EXTEND TIME

Respondent Adrian L. Falgione, by and through his undersigned counsel, hereby moves pursuant to Rule 240, SCACR, for a thirty-day extension of time to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is this Respondent's first request for an extension. The current due date for Respondent to file his Initial Brief is June 26, 2015. The new due date would be July 27, 2015.

June 22, 2015

  
Benjamin C. Bruner  
Bruner, Powell, Wall & Mullins, LLC  
P.O. Box 61110  
Columbia, South Carolina 29260  
803-252-7693  
*Attorney for Respondents*

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

PROOF OF SERVICE

I, Bridget Steele, an employee of Bruner, Powell, Wall & Mullins, LLC, attorneys  
for Respondent Adrian L. Falgione, certify that I served a copy of the attached *Motion to  
Extend Time* by depositing a copy of it in the U.S. Mail, postage prepaid, on June 22,  
2015, addressed to the *pro se* Appellant, James B. Spencer, 7001 Saint Andrews Road,  
Suite 183, Columbia, South Carolina 29212, and to Respondent John R. Rakowsky's  
attorneys of record, David W. Overstreet, Esquire and Michael B. McCall, Esquire at  
Carlock, Copeland & Stair, LLP, 40 Calhoun Street, Suite 400, Charleston, South  
Carolina 29401.

June 22, 2015

  
Bridget Steele

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BRUNER, POWELL, WALL & MULLINS, LLC

ATTORNEYS AND COUNSELORS AT LAW

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WARREN C. POWELL, JR., P.A.\*\*

HENRY P. WALL

E. WADE MULLINS, III, P.A.

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JOEY R. FLOYD, P.A.

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\* Of Counsel

\*\* Also Admitted in District of Columbia

AUTHOR'S E-MAIL: [BBRUNER@BRUNERPOWELL.COM](mailto:BBRUNER@BRUNERPOWELL.COM)

June 22, 2015

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings

Clerk of Court, S.C. Court of Appeals

1220 Senate Street

Columbia, SC 29201

RECEIVED  
JUN 24 2015  
SC Court of Appeals

**Re: James Spencer, et al. v. John Rakowsky, et al.**

**Case No.: 2014-00091**

**BPWM File No.: 3-1742.108**

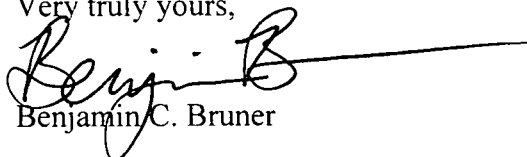
Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the *Motion to Extend Time* in the above referenced action. Please file the original, clock-in the copy and return them to me in the envelope provided.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

With my kindest regards, I am,

Very truly yours,

  
Benjamin C. Bruner

Enclosure

CC: James B. Spencer  
David W. Overstreet, Esq.  
Michael B. McCall, Esq.

BRUNER, POWELL, WALL & MULLINS, LLC

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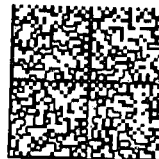
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JUN 22 2015

MAILED FROM ZIP CODE 29204

The Honorable Jenny Abbott Kitchings

Clerk of Court, S.C. Court of Appeals

PO Box 11629

Columbia, SC 29211

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SC Court of Appeals

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