

Rebell

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

Appellate Case No. 2013-23-01762

RECEIVED
JUL 14 2015
SC Court of Appeals

Carol Simpson, Appellant,
v.
Frank A. Landgraff, Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT
FRANK A. LANDGRAFF'S INITIAL BRIEF

Timothy E. Madden
Lane W. Davis
Reid T. Sherard
Nelson Mullins Riley & Scarborough, LLP
104 South Main Street
Poinsett Plaza, Suite 900
P.O. Box 10084 (29603)
Greenville, SC 29601
(864) 250-2300

Attorneys for Respondent
Frank A. Landgraff

Counsel for the Respondent Frank A. Landgraff ("Landgraff") hereby moves for an extension of time in which to serve and file his Initial Brief in the present case.

Due to counsel's present case load, including a large number of briefing and trial commitments, as well as other client commitments, an extension of time is required to fully respond to the issues presented in this case.

The undersigned counsel certifies that this request is not intended to cause undue delay and is necessary to properly prepare and present the response to the issues in the case.

Landgraff has not previously requested an extension of time in this matter.

Landgraff moves for an additional thirty days from the date of Appellant's Initial Brief in which to serve and file his Initial Brief in this case.

Landgraff further moves that time be stayed pending a decision on this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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Attorney for Frank A. Landgraff

Greenville, South Carolina

, 2015

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PROOF OF SERVICE

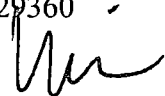
I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT FRANK A. LANDGRAFF'S INITIAL
BRIEF

Counsel Served:

William G. Mayer
118 West Main Street
Laurens, SC 29360


Lane W. Davis

July 7, 2015

Nelson Mullins

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July 7, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
PO Box 11629
Columbia, SC 29211

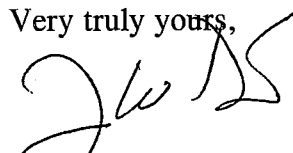
RE: Carol Simpson v. Frank Landgraff
Appellate Case No. 2015-000778
NMRS File No. 35353/01502

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of a Motion for an Extension of Time to File Respondent Frank A. Landgraff's Initial Brief in the above-referenced matter. Also enclosed is our check for the filing fee.

Please return a file stamped copy in the self-addressed, stamped envelope provided.

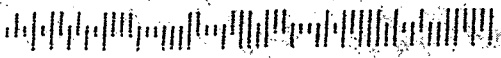
Very truly yours,



Lane W. Davis

LWD:ap
Enclosures
cc: William G. Mayer (w/enclosure)

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SC Court of Appeals



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The Honorable Jenny Abbott Kitchings

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