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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BARNWELL COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2015-000574

RECEIVED

JUL 14 2015

SC Court of Appeals

Joel C. Greene, Jr.,

Appellant,

v.

Clarence Felder a/k/a Clarence
Edward Felder a/k/a Clarence
E. Felder, individually and
d/b/a Custom Home
Improvements, Clarence E.
Felder, LLC, Ron Powell a/k/a
Ronald Powell, individually,
England Enterprises, Inc.,
a/k/a England Enterprises is
Closed, Inc., SAFEBuilt
Carolinas, Inc. f/k/a England
Enterprises a/k/a England
Enterprises, Inc., City of
Barnwell, Larry Nipper,
individually and d/b/a
Nipper's Electric Service,
Sanders Supply Company,
Inc., Griffin Specialty
Contracting, Inc., Gregory J.
Griffin, and John Doe
representing any other
unknown inspectors,
contractors or subcontractors
on this Project, Defendants,

Of Whom Ron Powell a/k/a
Ronald Powell, John England,
and England Enterprises, Inc.
a/k/a England Enterprises is

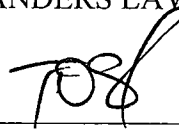
Closed, Inc., are the

Respondents.

MOTION FOR EXTENSION OF TIME FOR APPELLANT TO FILE INITIAL
BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD

With consent of Joshua D. Shaw, Esquire, Attorney for Respondents, Appellant Joel C. Greene, Jr. moves for a thirty (30) day extension of time to file the *Initial Brief* and the *Designation of Matter to be included in the Record* from July 15, 2015 to August 14, 2015.

SANDERS LAW FIRM, LLC



Thomas O. Sanders, IV (SCB# 064887)
1738 Three Oaks Avenue
Charleston, South Carolina 29407
(843) 573-8828
ATTORNEY FOR APPELLANT

July 10, 2015
Charleston, South Carolina

Other Counsel of Record:

Joshua D. Shaw, Esquire
J. Kenneth Carter, Jr., Esquire
Turner, Padgett, Graham & Laney, PA
Post Office Box 1473
Columbia, SC 29202
(803) 227-4310
Attorney for Respondents Powell and England



T.O. Sanders <tosanders@sanderslawfirm.com>

RE: Greene v. Powell and England (Appeal)

1 message

Shaw, Joshua D. <JShaw@turnerpadget.com>
To: "T.O. Sanders" <tosanders@sanderslawfirm.com>
Cc: Ida Mero <ida.mero@sanderslawfirm.com>

Fri, Jul 10, 2015 at 9:23 AM

T.O., you have our consent to an extension. Have a great weekend.

Josh

Turner | Padget

Joshua D. Shaw
Attorney
PO Box 1473 | Columbia, SC 29202
1901 Main Street, Suite 1700 | Columbia, SC 29201
803-227-4310 | Fax 803-400-1554
jshaw@turnerpadget.com
Bio | vCard | Location

From: T.O. Sanders [mailto:tosanders@sanderslawfirm.com]
Sent: Thursday, July 09, 2015 11:01 AM
To: Shaw, Joshua D.
Cc: Ida Mero
Subject: Re: Greene v. Powell and England (Appeal)

Yes. Please advise if you hear sooner. Thx.

T.O. Sanders
Attorney at Law
Sanders Law Firm, LLC
1738 Three Oaks Avenue
Charleston, SC 29407
(843) 573-8828

The information contained in this communication is attorney-client privileged and confidential. This communication is intended for the above-named only. If you are not the intended recipient, then any dissemination, distribution or copying of this communication is strictly prohibited. If you received this communication in error or if you are unsure whether or not it is privileged, then please notify us by return email and destroy any copies you have of this communication. Thank you for your help with this matter.

On Thu, Jul 9, 2015 at 10:59 AM, Shaw, Joshua D. <JShaw@turnerpadget.com> wrote:

T.O., I personally have no objection at all and do not expect one from my client, but I probably will not hear back from them until tomorrow. Can you wait until tomorrow to file?

Josh

Turner | Padget

Joshua D. Shaw
Attorney
PO Box 1473 | Columbia, SC 29202
1901 Main Street, Suite 1700 | Columbia, SC 29201
803-227-4310 | Fax 803-400-1554
jshaw@turnerpadget.com
Bio | vCard | Location

From: T.O. Sanders [mailto:tosanders@sanderslawfirm.com]
Sent: Thursday, July 09, 2015 10:50 AM
To: Ida Mero
Cc: Shaw, Joshua D.
Subject: Re: Greene v. Powell and England (Appeal)

I can get it done in < 30 days. I'm just not sure I can get it done by Wed. Thx for your help.

T.O. Sanders
Attorney at Law
Sanders Law Firm, LLC
1738 Three Oaks Avenue
Charleston, SC 29407
(843) 573-8828

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On Thu, Jul 9, 2015 at 10:19 AM, Ida Mero <ida.mero@sanderslawfirm.com> wrote:

Mr. Shaw,

Mr. Sanders needs to request another 30-day extension in which to file his Initial Brief in the above-referenced matter. Would you be willing to consent to his request for extension?

I look forward to hearing from you.

Ida D. Mero
Senior Legal Assistant
Sanders Law Firm, LLC
1738 Three Oaks Avenue
Charleston, SC 29407
(843) 573-8828

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Carolinas, Inc. f/k/a England
Enterprises a/k/a England
Enterprises, Inc., City of
Barnwell, Larry Nipper,
individually and d/b/a
Nipper's Electric Service,
Sanders Supply Company,
Inc., Griffin Specialty
Contracting, Inc., Gregory J.
Griffin, and John Doe
representing any other
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Of Whom Ron Powell a/k/a
Ronald Powell, John England,
and England Enterprises, Inc.
a/k/a England Enterprises is

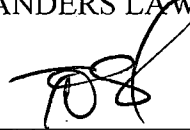
Closed, Inc., are the

Respondents.

PROOF OF SERVICE

I certify that I have served the *Motion for Extension of Time for Appellant to file Initial Brief* and the *Designation of Matter to be included in the Record* on Respondents Ron Powell a/k/a Ronald Powell, John England, and England Enterprises, Inc. a/k/a England Enterprises is Closed, Inc., by depositing a copy of it in the United States Mail, postage prepaid, on July 10, 2015, addressed to its attorneys of record, Joshua D. Shaw and J. Kenneth Carter, Jr. (PO Box 1473, Columbia, SC 29202).

SANDERS LAW FIRM, LLC



Thomas O. Sanders, IV (SCB# 064887)
1738 Three Oaks Avenue
Charleston, South Carolina 29407
(843) 573-8828
ATTORNEY FOR APPELLANT

July 10, 2015
Charleston, South Carolina

SANDERS LAW FIRM, LLC

1738 THREE OAKS AVENUE
CHARLESTON, SOUTH CAROLINA 29407
WWW.SANDERSLAWFIRM.COM

THOMAS O. SANDERS, IV, ATTORNEY AT LAW
Certified Mediator by S.C. Supreme Court

Tel: (843)573-8828
Fax: (843)573-9288
tosanders@sanderslawfirm.com

July 10, 2015

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

RECEIVED

JUL 14 2015

SC Court of Appeals

RE: Greene v. Felder, et al., 2015-000574

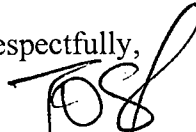
Dear Ms. Kitchings:

Attached please find an original and seven copies of the following: 1) *Motion of Extension of Time for Appellant to file Initial Brief and Designation of Matter to be Included in the Record with Proof of Service*; and 2) Check number 1318 in the amount of \$25.00 for the filing fee in the above-referenced action. Please file the original and return to me one clocked copy in the self-addressed, stamped envelope provided.

Additionally, I respectfully request verification from you that *Appellant's Initial Brief and Designation of Matter to be Included in the Record* is now due on August 14, 2015.

Thank you in advance for your help. I look forward to hearing from you.

Respectfully,

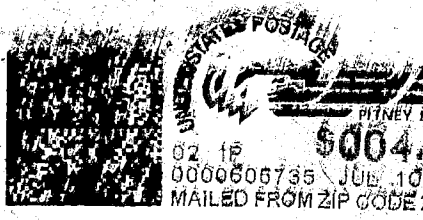


Thomas O. Sanders, IV

TOS/idm

cc: Joel C. Greene, Jr., D.C. (by email) ✓
J. Kenneth Carter, Esquire (by email) ✓
Joshua D. Shaw, Esquire (by email) ✓

PS: I have conferred with Attorney Joshua D. Shaw who consents.



SANDERS LAW FIRM, LLC
1738 THREE OAKS AVENUE
CHARLESTON, SOUTH CAROLINA, 29407

ADDRESS SERVICE REQUESTED

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The Honorable Jenny Abbott Kitchings
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