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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEE COUNTY
Court of Common Pleas

Walter Newman, Special Referee

Appellate Case No. 2015-000498

RECEIVED
JUL 15 2015
SC Court of Appeals

A&P Enterprises, LLC,Appellant,

v.

SP Grocery of Lynchburg, LLC and Suresh "Sam" Patel Respondents.

**MOTION FOR EXTENSION TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL**

Appellant, A&P Enterprises, LLC, by and through its undersigned counsel, hereby moves for a Ten. (10) day extension of time to file its Reply Brief and Designation of Matter. This Motion is made on the grounds that Attorney Margaret Hazel, who was to prepare the Reply Brief and Designation of Matter for Appellant has left the employ of Moore Taylor Law Firm, P.A. The undersigned, Attorney John C. Bradley, Jr. took over this case and other appeals that Attorney Hazel was working on.


As a result of Attorney Hazel leaving, the undersigned has had, or has the following deadlines due in the South Carolina Court of Appeals: a Record on Appeal due July 8th; an Initial Brief and Designation of Matter due July 8th; a Record on Appeal due July 12th; two Reply Briefs due on July 20th; a Reply brief due July 23rd;

and three final briefs due July 28th and 29th and 30th. As a result of this increased work load, the undersigned needs additional time to complete the Reply Brief and Designation of Matter to be Included in the Record on Appeal in this case.

This is the first request for an extension to file the Reply Brief and is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations, the extension, if granted, would extend Appellant's deadline for filing the Reply Brief and Designation of Matter to July 30, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Reply Brief and Designation of Matter to July 30, 2015.

Respectfully submitted,

By:  _____

S. Jahue Moore
John C. Bradley, Jr.
MOORE TAYLOR LAW FIRM, PA
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West Columbia, South Carolina

July 15, 2015

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Court of Common Pleas

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Walter Newman, Special Referee

JUL 15 2015

Appellate Case No. 2015-000498 **SC Court of Appeals**

A&P Enterprises, LLC,..... Appellant,

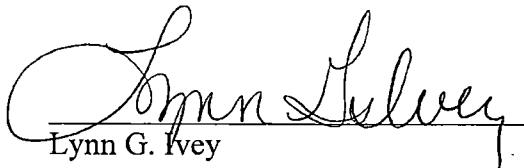
v.

SP Grocery of Lynchburg, LLC and Suresh "Sam" Patel Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served Appellant's Motion for Extension of Time to File Reply Brief and Designation of Matter on counsel of record for Respondent in this action by depositing a copy of same in the United States Mail, postage prepaid, on July 15, 2015, addressed as follows:

William Wheeler, III
Jennings & Jennings, P.A.
Post Office Box 106
Bishopville, SC 29010-0106


Lynn G. Ivey

July 15, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201
VIA Hand Delivery

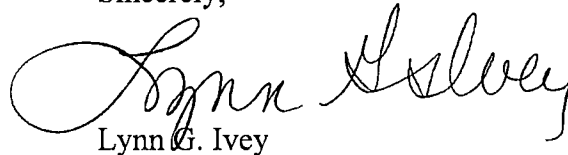
Re: A&P Enterprises, LLC vs. SP Grocery of Lynchburg, LLC, Payal
Suresh Patel, and Suresh "Sam" Patel
Appellate Case No. 2015-000498

Dear Ms. Kitchings:

Enclosed for filing is the original and three copies of our motion to extend time to file our reply brief and designation of matter in the above referenced matter. Also enclosed is our firm check for \$25.00 for the filing fee. Please return the clocked copies via our courier.

By cover of this letter, we are serving notice of our motion to opposing counsel.

Sincerely,


Lynn G. Ivey

Enclosures

cc: William Wheeler, III, Esquire

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JUL 15 2015
SC Court of Appeals

S. Jahue Moore*
J. Mark Taylor*
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Billy C. Coleman (Ret.)