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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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AUG 26 2015

SC Court of Appeals

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APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

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Appellate Case No.: 2015-000574

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Joel C. Greene, Jr., Appellants,

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 Rowell a/k/a Ronald Powell,  
John England, and England Enterprises, Inc. a/k/a  
England Enterprises is Closed, Inc. are the Respondents.

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**Respondents' Motion for Extension of Time**

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Pursuant to Rules 240 and 263, SCACR, the Respondents Ron Powell a/k/a Ronald Powell, John England, and England Enterprises, Inc. a/k/a England Enterprises is Closed, Inc., by and through their undersigned counsel, hereby move for an extension of time in which to file and serve their Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal. The current deadline for filing and serving those materials is Tuesday, September 8, 2015.<sup>1</sup> The Respondents base their motion on the following grounds:

(1) The Respondents' attorney needs additional time in order to fully analyze the Appellant's Initial Brief and other relevant documents and materials, and then prepare the Initial Respondents' Brief.

(2) The attorney for the Appellant has authorized the undersigned counsel to inform the Court that he does not oppose this request for an extension.

(3) Counsel for the Respondents has not previously requested an extension in this case.

For these reasons, the Respondents respectfully request that this Court extend the deadline for filing and serving the Respondents' Initial Brief and Designation of Matter until Thursday, October 8, 2015.

(Signature Block on Following Page)

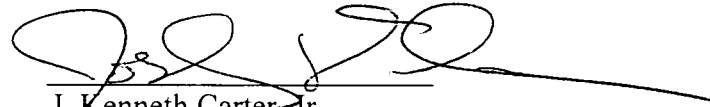
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<sup>1</sup> Appellant's Initial Brief was served August 5, 2015. Because September 5 is a Saturday and the following Monday (September 7) is Labor Day, Respondent's Initial Brief would be due Tuesday, September 8. See Rule 263, SCACR.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY P.A.

By:



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*Attorneys for Ron Powell a/k/a Ronald Powell,  
John England, and England Enterprises, Inc. a/k/a  
England Enterprises is Closed, Inc.*

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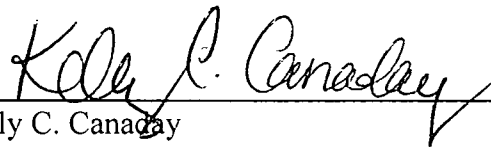
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CERTIFICATE OF SERVICE

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I, the undersigned employee of Turner, Padgett, Graham & Laney, P.A., attorneys for defendant Ron Powell a/k/a Ronald Powell, John England, and England Enterprises, Inc. a/k/a England Enterprises is Closed, Inc. do hereby certify that I have this day served a copy of the foregoing **Respondents' Motion for Extension of Time** in connection with the above-referenced case by placing a copy of the same in the United States Mail, postage prepaid, to the following address(es):

*Thomas O. Sanders, IV, Esq.  
Sanders Law Firm, LLC  
1738 Three Oaks Avenue  
Charleston, SC 29407*



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Kelly C. Canaday  
Legal Secretary

Columbia, South Carolina  
August 26, 2015

# Turner | Padget

Joshua D. Shaw

REPLY TO:

JShaw@TurnerPadget.com  
Direct dial: 803-227-4310  
Direct Fax: 803-400-1554

August 26, 2015

**VIA HAND DELIVERY**

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

**RECEIVED**  
AUG 26 2015  
SC Court of Appeals

Re: Joel C. Greene, Jr. v. Clarence Felder, et al.  
Appellate Case No. 2015-000574  
Our File No. 7900.109

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondents' Motion for Extension of Time regarding Respondents' Initial Brief in the above-referenced matter. Also enclosed are the original and one copy of the Certificate of Service and our check for the filing fee. Please file the original documents and return clocked copies to me via office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Joshua D. Shaw

JDS/kcc  
Enclosures

cc: Thomas O. Sanders, IV, Esquire