

77103

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

J. Ernest Kinard, Jr., Judge

Appellate Case No. 2014-002733

RECEIVED

AUG 31 2015

SC Court of Appeals

Samuel Washington, Jr., Respondent,

v.

South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a Emerson
Network Power, and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company is the Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE PROOF OF SERVICE OF THE RECORD ON APPEAL**

NOW COMES counsel for Appellant, and moves this Honorable Court to grant an extension of time to file the Proof of Service of the Record on Appeal, submitted for filing simultaneously herewith. Counsel submits as justification for this request that this is Appellant's first request for an extension to file the Proof of Service out of time.

August 28, 2015



John A. Massalon, Esquire SC Bar #010279
I. Ryan Neville, Esquire SC Bar # 76513
WILLS MASSALON & ALLEN LLC
Post Office Box 859
Charleston, South Carolina 29402
(843) 727-1144

ATTORNEYS FOR APPELLANT

Other Counsel of Record:

Margie Bright Matthews, Esquire
Margie Bright Matthews, LLC
Post Office Box 499
Walterboro, SC 29488

And

S. Kirkpatrick Morgan, Jr., Esquire
Charles T. Slaughter, Esquire
Walker Morgan
Post Office Box 949
Lexington, South Carolina 29071

ATTORNEYS FOR RESPONDENT

H. Michael Bowers, Esquire
Smith Moore Leatherwood LLP
25 Calhoun Street, Suite 250
Charleston, SC 29401

ATTORNEYS FOR EMERSON
ELECTRIC COMPANY

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

J. Ernest Kinard, Jr., Judge

Case No. 2014-002733

RECEIVED

AUG 31 2015

SC Court of Appeals

Samuel Washington, Jr.....Respondent,

v.

South Carolina Electric and Gas Company; and Emerson Electric Company d/b/a
Emerson Network Power, and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company.....Appellant.

PROOF OF SERVICE

I certify that I served Appellant's Motion for Extension of Time to File Proof of Service of the Record on Appeal on Respondent Samuel Washington, Jr. by depositing a copy of it in the United States Mail, postage prepaid, on August 28, 2015, addressed to his attorneys of record, Margie Bright Matthews, Margie Bright Matthews, LLC, Post Office Box 499, Walterboro, SC 29488 and S. Kirkpatrick Morgan, Jr. and Charles T. Slaughter, Walker Morgan, LLC, Post Office Box 949, Lexington, SC 29071, and that the same was also served on Co-Defendant Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power by depositing a copy of it in the United States Mail, postage prepaid, on August 28, 2015 addressed to its attorneys of record, H. Michael Bowers, Esquire, Smith Moore Leatherwood LLP, 25 Calhoun Street, Suite 250, Charleston, SC 29401.

August 28, 2015



John A. Massalon, Esquire SC Bar #010279

I. Ryan Neville, Esquire SC Bar # 76513

WILLS MASSALON & ALLEN LLC

Post Office Box 859

Charleston, South Carolina 29402

(843) 727-1144

ATTORNEYS FOR APPELLANT

WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402
Phone: 843-727-1144 • Fax: 843-727-7696 • www.wmalawfirm.net

August 28, 2015

Direct Dial: (843) 793-6041

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

RE: Samuel Washington, Jr. v. South Carolina Electric and Gas Company, Emerson
Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power
Appellate Case No.: 2014-002733
Our File No.: 1900-202

RECEIVED

AUG 31 2015

Dear Ms. Kitchings:

SC Court of Appeals

In regard to the above-referenced matter, please find enclosed for filing the following:

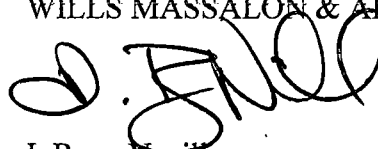
1. The original and one (1) copy of the Proof of Service of Record on Appeal;
2. The original and seven (7) copies of Appellant's Motion for Extension of Time to File Proof of Service of the Record on Appeal and Proof of Service of the same; and
3. Wills Massalon & Allen LLC's check #7162 in the amount of \$25.00 representing the filing fee.

Please return one (1) file-stamped copy of each document to me in the self-addressed, stamped envelope provided. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



I. Ryan Neville
mneville@wmalawfirm.net

IRN/cb

Enclosures

cc: Margie Bright Matthews, Esquire
S. Kirkpatrick Morgan, Jr., Esquire
H. Michael Bowers, Esquire
Charles T. Slaughter, Esquire
Bryony Bowers Hodges, Esquire (via e-mail)
Ms. Sandy Kammer (via e-mail)



UNITED WE STAND



UNITED STATES POSTAGE



02 1P \$ 002.080
0001925232 AUG 28 2015
MAILED FROM ZIP CODE 29401

WMA

WILLS MASSALON & ALLEN LLC

Post Office Box 859
Charleston, SC 29402

RECEIVED

AUG 31 2015

SC Court of Appeals

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