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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2015-000553

Meridian Films, Inc., Video Group, LLC, Bodylab, LLC, Firm Direct, LLC and Firm Media, LLC.....Appellants

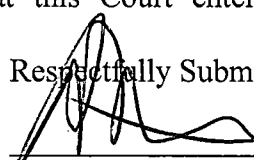
v.

Everrett C. Davis, Barbara J. Mooneyham, Carl S. Copeland and James L. Leslie, Jr.....Respondents

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER

The Appellants hereby move, in accordance with Rule 224 SCACR, for a seven (7) day extension of time to file and serve their initial brief and designation of matter. These filings are now due on August 19, 2015. This extension will make these filings due on or before August 26, 2015. The reasons supporting this extension are set forth in the attached Declaration of the Appellants' attorney, Arthur K. Aiken.

WHEREFORE, the Appellants pray that this Court enter an order granting this extension.

Respectfully Submitted,


Arthur K. Aiken
Aiken & Hightower, PA
2231 Devine Street, Suite 201
Columbia, SC 29205
Telephone: 803-799-5205
Email: art@aikenandhightower.com
ATTORNEYS FOR APPELLANTS

August 19, 2015
Columbia, SC

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DECLARATION OF ARTHUR K. AIKEN

The undersigned, Arthur K. Aiken, declares under penalty of perjury that the following is true to the best of his knowledge, information, and belief:

1. I am the attorney for the Appellants in the above captioned civil appeal.
2. This appeal involves complicated issues related to the validity of certain copyright claims.
2. The record developed in the trial court is quite extensive.
3. My clients' initial brief and designation of matter are presently due on August 19, 2015, and I cannot meet that deadline.
4. I have spent most of my time on this case up to this point trying to organize the elements of the record developed in the trial court, researching copyright law of which I was largely

ignorant before my involvement in this case, and drafting portions of my brief.

5. Over the last few weeks, I have had three (3) cases set for jury trials.

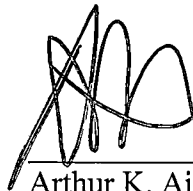
6. All of those jury trials were continued at the last moment, but I still had to prepare for those trials.

7. I have also spent a great deal of time over the last month month working on a federal criminal case in which my client is charged with multiple armed career criminal counts on which he faces a sentencing range of thirty (30) years to life under the United States Sentencing Guidelines and two appointed criminal cases for clients facing the prospect of life without parole sentences.

8. The subject deadline was previously extended from May 6, 2015 to June 5, 2015, from June 5, 2015 to July 20, 2015 and from July 20, 2015 until August 19, 2015.

9. I am informed and believe that there is good cause for a seven (7) day extension of the July 20, 2015 deadline.

THE UNDERSIGNED SO DECLARES



Arthur K. Aiken

Columbia, SC
August 19, 2015

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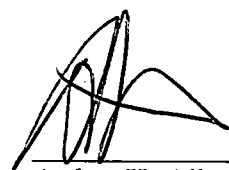
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v.

Everrett C. Davis, Barbara J. Mooneyham, Carl S. Copeland and James L. Leslie, Jr.....Respondents

PROOF OF SERVICE

I certify that I have served the Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter on counsel for the Respondents on August 19, 2015 by mailing a copy of the Motion to S. Jahue Moore, Moore Taylor Law Firm, P.A., PO Box 5709, West Columbia, S.C. 29171.



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July 20, 2015
Columbia, SC

AIKEN & HIGHTOWER, P.A.

Attorneys at Law
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Phone: 803-799-5205
Fax: 803-799-5206

Arthur K. Aiken, Esq.

A. Bea Hightower, Esq.

August 19, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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RE: Meridian Films et al v. Everett C. Davis et al
Appellate Case No.: 2015-000553

Dear Ms. Kitchings:

I have enclosed for filing the original and seven (7) copies of the Proof of Service, Appellant's Motion for Extension for Time, Declaration of Arthur Aiken, attorney for Appellants, and a \$25.00 check in the above-captioned appeal. Please return a date-stamped copy to our office in the enclosed envelope at your earliest convenience.

By enclosure with a copy of this letter, I have served the enclosed on the Respondents' counsel, S. Jahue Moore. Please call me if you have any questions or need any clarification regarding these enclosures.

Thank you for your help.

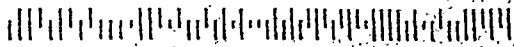
Sincerely,



Arthur K. Aiken
art@aikenandhightower.com

Enclosures as stated

cc: S. Jahue Moore (w/enclosure)
Mark Henriksen (w/enclosure)



COLUMBIA SC 292

WED 19 AUG 2015

Aiken & Hightower, PA
2231 Devine Street Suite 201
Columbia, SC 29205

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