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**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
D. Garrison Hill, Circuit Court Judge**

**Appellate Case No.: 2015-000476**

**Lower Case No. 2012-CP-23-02887**

**RECEIVED**

SEP 09 2015

SC Court of Appeals

David Wilson, individually and derivatively on behalf of Carolina Custom Converting, LLC, Plaintiff,

v.

John Gandis, Andrea Comeau-Shirley, Zoi Films, LLC, and Carolina Custom Converting, LC, Defendants,

John Gandis and Andrea Comeau-Shirley, Third-Party Plaintiffs,

v.

Carolina Custom Converting, LLC, Third Party Defendant and Counterclaim Plaintiff,

v.

Dave Wilson, Steve Norvell, Neologic Distribution, Inc. and Fresh Water Systems, Inc.,

Of Whom David Wilson, Neologic Distribution, Inc., and Fresh Water Systems, Inc., are the Respondents/Appellants,

and

John Gandis, Andrea Comeau-Shirley, and Carolina Custom Converting, LLC, are the Appellants/Respondents.

**JOINT MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEFS AND DESIGNATIONS OF MATTER**

Appellants/Respondents' and Respondents/Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal are due on September 9, 2015. Appellants/Respondents and Respondents/Appellants respectfully request the Court grant an extension of 60 days for serving and filing Appellants/Respondents' and Respondents/Appellants' Initial Brief and Designation of Matter. Counsel for Respondents/Appellants requests an extension due to attorney not receiving the transcript until August 21, 2015—the transcript testimony itself is approximately 1000 pages excluding exhibits. There are approximately 300 Exhibits to the trial transcript. Counsel for Appellants/Respondents requests an extension due to lead counsel's health related issues related to pulmonary function and continued medication. Accordingly, counsel for Appellants/Respondents and Respondents/Appellants respectfully requests a 60-day extension of time in which to file and serve the Initial Briefs and Designations of Matter.

Respectfully submitted,



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JOSEPH O. SMITH  
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**Attorneys for Appellant/ Respondents**  
**John Gandis and Andrea Comeau-Shirley**

Respectfully submitted,



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**Attorney for Appellant/ Respondent  
Carolina Custom Converting, LLC**

Respectfully submitted,



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**Attorney for Respondent/Appellant  
Dave Wilson**

Respectfully submitted,



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BRUCE B. CAMPBELL

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**Attorney For Respondent/Appellant  
Neologic Distribution, Inc. and Fresh Water  
Systems, Inc.**

Dated September 2, 2015

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
D. Garrison Hill, Circuit Court Judge

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Plaintiff,

v.

John Gandis, Andrea Comeau-Shirley, Zoi Films, LLC, and Carolina Custom Converting, LLC,  
Defendants,

John Gandis and Andrea Comeau-Shirley, Third Party Plaintiffs,

v.

Carolina Custom Converting, LLC, Third Party Defendant and Counterclaim Plaintiff,

v.

Dave Wilson, Steve Norvell, Neologic Distribution, Inc. and Fresh Water Systems, Inc.,

Of Whom David Wilson, Neologic Distribution, Inc., and Fresh Water Systems, Inc., are the  
Respondents/Appellants,

and

John Gandis, Andrea Comeau-Shirley, and Carolina Custom Converting, LLC, are the  
Appellants/Respondents.

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**PROOF OF SERVICE**

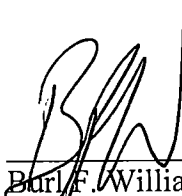
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I certify that I have served the Joint Motion for Extension of Time to File Initial Briefs and Designations of Matter, by depositing a copy of same in the United States Mail, postage prepaid, on September 3, 2015, addressed to its attorneys of record:

D. Randle Moody, II, Esquire  
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September 3, 2015

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SEP 09 2015  
SC Court of Appeals

The Honorable Jenny Abbott Kitchens  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

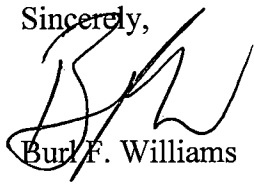
Re: *David Wilson, et al. v. John Gandis, et al.*  
Appellate Case No. 2015-000476

Dear Ms. Kitchens:

Please find enclosed the original JOINT MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEFS AND DESIGNATIONS OF MATTER, plus two copies, along with the \$25.00 filing fee in the above-referenced case.

Please file the original and return a file stamped copy in the enclosed self-addressed postage paid envelope.

Sincerely,



Burl F. Williams

BFW/vgp  
Enclosures

cc: Counsel of Record

- Charleston
- Charlotte
- Columbia
- Greensboro
- Greenville**
- Hilton Head
- Myrtle Beach
- Raleigh

# NEXSEN | PRUET

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Greenville SC 29603-0648

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The Honorable Jenny Abbott Kitchens  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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