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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SEP 15 2015

SC Court of Appeals

APPEAL FROM ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2015-000733

Kan Enterprises, Inc., d/b/a A 1 Food Stores,..... Appellant,

v.

South Carolina Department of Revenue, Ellen Fishburne Triplett,  
Keith McIver, Samuel L. Munson, Jocelyn Munson, and Michael Hill,..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO CITY OF  
COLUMBIA'S MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN  
SUPPORT OF RESPONDENTS**

The undersigned, as counsel for Appellant Kan Enterprises, Inc., d/b/a A 1 Food Stores, hereby moves for a Ten (10) day extension time to file its Response to City of Columbia's Motion for Leave to File Amicus Curiae Brief in Support of Respondents. This Motion is made on the grounds that John C. Bradley, Jr., the undersigned counsel for Appellant Kan Enterprises, Inc., d/b/a A 1 Food Stores, has an unusually heavy workload with multiple out of state depositions during the week of September 14, 2015, and needs additional time to prepare a Response in this matter.

This is the first extension request for the Response to City of Columbia's Motion 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 Response to City of Columbia's Motion for Leave to File Amicus Curiae Brief in Support of Respondents to September 28, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Response to September 28, 2015.

Respectfully submitted,

By: 

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S. Jahue Moore  
John C. Bradley, Jr.  
MOORE TAYLOR LAW FIRM, PA  
1700 Sunset Boulevard  
West Columbia, SC 29169  
803-796-9160  
803-791-8410 (Fax)  
[john@mttlaw.com](mailto:john@mttlaw.com)

Kenneth E. Allen  
1201 Main St., Suite 1980  
Columbia, SC 29201  
(803) 748-8452  
ATTORNEYS FOR APPELLANT

West Columbia, South Carolina

September 15, 2015

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**PROOF OF SERVICE**

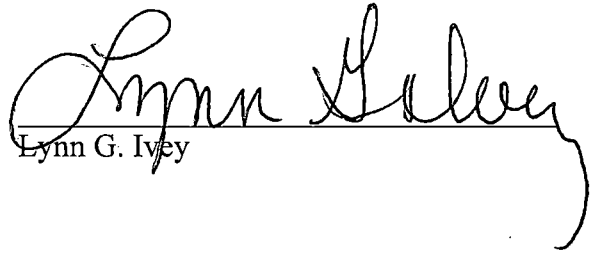
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I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served the Motion for Extension of Time to File Response to City of Columbia's Motion for Leave to File Amicus Curiae Brief in Support of Respondents by mail, to the following parties by depositing a copy of same in the United States Mail, postage prepaid, on September 15, 2015, addressed as follows:

Justine M. Tate, Esquire  
Sean Ryan, Esquire  
Counsel for Litigation  
SC Department of Revenue  
P.O. Box 12265  
Columbia, SC 29211

Kathleen McDaniel, Esquire  
Callison Tighe & Robinson, LLC  
PO Box 1390  
Columbia, SC 29202-1390

Patrick C. Sharpe, Esquire  
City of Columbia  
PO Box 667  
Columbia, SC 29202

  
Lynn G. Ivey

West Columbia, South Carolina

September 15, 2015