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SEP 25 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas

Steven H. John, Circuit Court Judge

Case No. 2015-000670

Anita Bacchi and Kristine Lomas

Respondents,

v.

America's Source Consulting  
Agency, LLC

Appellant.

MOTION TO SUBSTITUTE COUNSEL AND

MOTION FOR EXTENSION

Francis A. Humphries, Jr.  
Monckton, Hembree and Humphries, P.A.  
1300 Professional Drive, Suite 102  
Myrtle Beach, South Carolina, 29577  
(843) 946-6556  
Attorney for Respondents

By this motion, Respondents move to substitute counsel in this appeal and further move for an extension to file Initial Brief.

In support of these motions, the Respondents respectfully submit the following:

1. The Respondents were originally represented in the matter below by James Marshall Biddle, Esquire;

2. James Marshall Biddle, due to his current license status with the South Carolina Supreme Court, may not continue as counsel for the purposes of this appeal;

3. The Respondents have, in practical terms, been unrepresented since the South Carolina Supreme Court action on Mr. Biddle's license;

4. This appeal was taken during the same time period in which Mr. Biddle's license to practice law was definitely suspended;

5. Neither Respondent Bacchi nor Respondent Lomas are attorneys and neither has legal experience necessary to advance their relative positions in this appeal;

6. Francis A. Humphries, Jr., Esquire, was contacted by Respondents on Monday, September 21, 2015, and, informally on dates immediately prior, and formally retained Mr. Humphries in connection with this appeal shortly thereafter;

7. Mr. Humphries is informed and believes Initial Brief of Respondents was to be filed no later than September 22, 2015;

8. Mr. Humphries was actively engaged in a term of Municipal Court in the City of North Myrtle Beach beginning Monday, September 21, 2015, where he serves by contract as City Prosecutor;

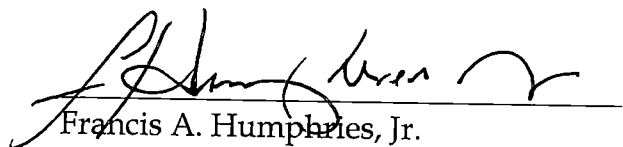
9. Mr. Humphries contacted counsel for the Appellant, Vicki Koutsogiannis, who orally consented to an extension in which to file the Initial Brief on behalf of the Respondents;

10. By letter, Ms. Koutsogiannis consents to an extension which is, in part, the subject of this motion (see Attachment 1);

11. Mr. Humphries requests an extension in order to competently research, draft and file the Initial Brief of Respondents given the date which he was retained and his trial schedule of the same time period.

BASED UPON THE ABOVE, Respondents move to substitute counsel and making Francis A. Humphries, Jr., Esquire, counsel of record. Further, Respondents move for an Order granting an extension to file the Initial Brief of Respondents.

I SO MOVE:



Francis A. Humphries, Jr.  
Monckton, Hembree and Humphries, P.A.  
1300 Professional Drive, Suite 102  
Myrtle Beach, South Carolina, 29577  
(843) 946-6556  
Attorney for Respondents

September 24, 2015  
Myrtle Beach, SC

**JAMES R. SNELL, JR., LLC**

316 South Lake Drive  
Lexington, South Carolina 29072  
(803) 359-3301  
Fax (803) 359-7691

September 15, 2015

Francis A. Humphries, Jr.  
Monckton, Hembree, Mureddu & Humphries, P.A.  
1300 Professional Drive, Suite 102  
Myrtle Beach, South Carolina 29577

**Re: Anita Bacchi vs. America's Source (2)**  
**Appellate Case No.: 2015-000670**

Dear Mr. Humphries:

Enclosed please find a copy of the Appellant's Initial Brief in this matter with all relevant attachments (Designation of Matter to be Included in Record on Appeal, Rule 209(c) Certification, and Certificate of Service on J. Marshall Biddle).

We had originally requested a continuance in June and it was granted until July 22, 2015. Our Initial Brief was ultimately filed on July 21, 2015. Also enclosed please find a copy of the letter I sent to the Court of Appeals dated September 4, 2015, wherein I explained this situation to them and informed the court that I consented to an extension at that time. I also consent to your seeking a second extension, as discussed on the phone with you on this date, given the circumstances of the former attorney in this case.

Please do not hesitate to contact me with any questions you may have.

Sincerely,



Vicki Koutsogiannis  
Attorney at Law

Enclosures

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Steven H. John, Circuit Court Judge

Case No. 2015-000670

Anita Bacchi and Kristine Lomas

Respondents,

v.

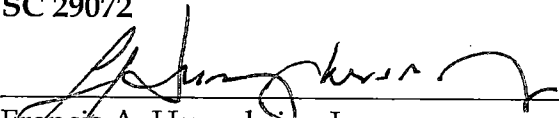
America's Source Consulting  
Agency, LLC

Appellant.

PROOF OF SERVICE

I certify that I have served a copy of the Motion to Substitute Counsel and Motion for Extension with Attachment and a copy of the Proof of Service on the Appellant, America's Source Consulting Agency, LLC, by Postage pre-paid Overnight Service on September 24, 2015 addressed to the attorney of record, Vicki Koutsogiannis, at the following address:

**Vicki Koutsogiannis, Esquire**  
**316 South Lake Dr.**  
**Lexington, SC 29072**

  
Francis A. Humphries, Jr.  
Monckton, Hembree and Humphries, P.A.  
1300 Professional Drive, Suite 102  
Myrtle Beach, South Carolina, 29577  
(843) 946-6556  
Attorney for Respondents

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SC Court of Appeals

**MONCKTON, HEMBREE, MUREDDU  
& HUMPHRIES, PA**

ATTORNEYS AT LAW

WILLIAM H. MONCKTON, VI  
DEAN N. MUREDDU

**RECEIVED**  
SENATOR GREGORY HEMBREE  
FRANCIS A. HUMPHRIES, JR.

September 24, 2015

SEP 25 2015  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
P.O. Box 11629  
Columbia, SC 29211

**RE: Anita Bacchi and Kristine Lomas vs. America's Source Consulting  
Agency, LLC**

Dear Jenny Abbott Kitchings,

I have enclosed the Original Motion to Substitute Counsel and a Motion for Extension along with six (6) copies for filing in your court. Also included is a Proof of Service for the documents sent to Vicki Koutsogiannis. The filing fee of \$50.00 for the two Motions is also included. Please contact our office if there is anything else needed to complete the filing.

Best regards,



Karen Sanders  
Paralegal to Francis A. Humphries, Jr.

cc: file

Enclosures: as noted

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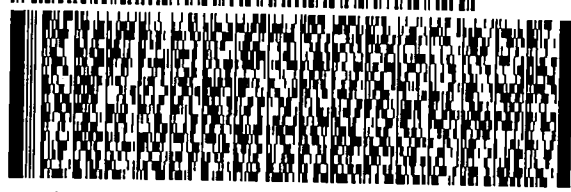
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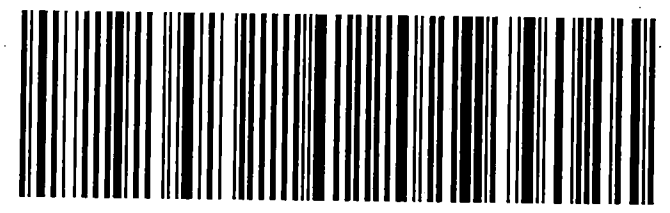
TO HONORABLE JENNY A. KITCHINGS  
 SC COURT OF APPEALS  
 1220 SENATE STREET  
 COLUMBIA SC 29201  
 (803) 734-1890  
 REF: SC Court of Appeals

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 State: SC ZIP: 29577-5768

**2 Recipient's Name, Address, City, State, ZIP code.**

Company: Honorable Jenny A. Kitchings  
 Phone: 803 734-1890  
 Address: SC Court of Appeals  
 1220 Senate St.  
 State: SC ZIP: 29201

**3 Recipient's Name, Address, City, State, ZIP code.**

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