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THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2015-001178

RECEIVED
NOV 16 2015
SC Court of Appeals

Corey Ross,.....Appellant,

v.

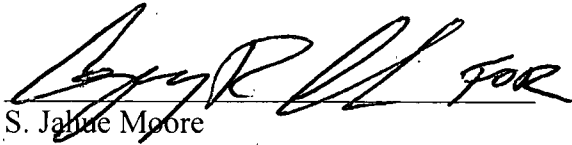
Carolina Adventure World, LLC,.....Respondent.

SECOND MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, counsel for Appellant Corey Ross moves for an extension of the deadline for serving and filing the respondent's initial brief and designation of matter to be included in the record on appeal. These documents were due originally to be filed by Respondent on November 16, 2015. This is the second request for an extension filed by Respondent.

At present, counsel is under an unusually heavy trial and appeal schedule, and will be unable to complete these documents by the November 16 deadline. Accordingly, counsel respectfully moves for a thirty-day extension in which to file the appellant's initial brief and designation of matter, to December 16, 2015. This request is not intended to unfairly delay the proceedings, and Counsel for Appellant does not believe it would be unfairly prejudicial to either party.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Jahné Moore", written over a horizontal line.

S. Jahné Moore

MOORE TAYLOR LAW FIRM, P.A.

P.O. Box 5709

West Columbia, South Carolina 29171

Telephone: 803-796-9160

Attorney for Appellant Corey Ross

West Columbia, South Carolina

November 13, 2015.

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Corey Ross,.....Appellant,

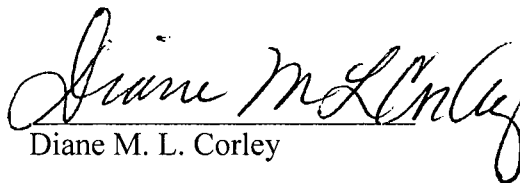
v.

Carolina Adventure World, LLC,.....Respondent.

PROOF OF SERVICE

I, Diane M. L. Corley, an employee of Moore Taylor Law Firm, PA certify that I have served the Motion for Extension on counsel of record for Respondents in this action by depositing a copy of same in the US Mail, postage prepaid, on November 16, 2015 to:

Christian Stegmaier
Meghan Hazelwood Hall
Collins & Lacy, P.C.
Post Office Box 12487
Columbia, SC 29201


Diane M. L. Corley

West Columbia, South Carolina
November 16, 2015

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SC Court of Appeals

S. Jahue Moore*
Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley*
Sheila McNair Robinson
Christian G. Spradley
David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Sarah Taylor Cassidy
Gregory R. Close

Robert D. Hazel
OF COUNSEL
Billy C. Coleman
RETIRED

November 13, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

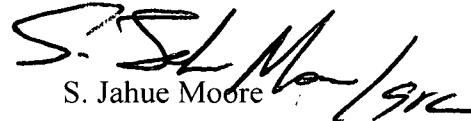
RE: Corey Ross v. Carolina Adventure World, LLC
Appellate Case No. 2015-001178

Dear Ms. Kitchings:

The Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal is due to be served and filed on November 16, 2015. Because of an unusually heavy workload, I respectfully request a second thirty-day extension of this deadline, to December 16, 2015. Enclosed is a check for the \$25 filing fee required with this request.

I am enclosing the original and six copies of our Second Motion for an Extension. I have called Christian Stegmaier and Meghan Hazelwood Hall, Counsels for Respondent, to notify them of our intention to file this motion, but I have not yet received a response.

Yours very truly,


S. Jahue Moore

SJM:dc

Enclosures

cc: Christian Stegmaier (w/ copy of encl.)
Meghan Hazelwood Hall (w/copy of encl.)