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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

RECEIVED
DEC 16 2015
SC Court of Appeals

Appellate Case No.: 2015-000476

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, 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,

and

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

**RESPONDENT DAVID WILSON'S MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF AND DESIGNATIONS OF MATTER**

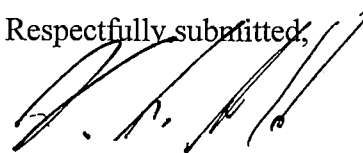
Respondent David Wilson is observant of the 78-page Initial Brief of the
Appellants John Gandis and Andrea Comeau-Shirley that was mailed on December 9,

2015, which exceeds the 50-page limit. Appellant Carolina Custom Converting, LLC also filed its Initial Brief on December 9, 2015. This makes the Respondent David Wilson's Initial Brief and Designation of Matter to be Included in the Record on Appeal due on January 11, 2016.

Respondent David Wilson respectfully requests that the Court grant an extension of 30 days for serving and filing Respondent's Initial Brief and Designation of Matter. Counsel for Respondent David Wilson requests an extension (1) due to the voluminous size of Appellants' Initial Briefs; (2) due to the Respondent's Initial Brief being due soon after the holidays; (3) due to Respondent's counsel having made non-refundable airline and hotel reservations for a holiday vacation, and (4) due to holiday travel consuming time.

Accordingly, counsel for Respondent respectfully requests a 30-day extension of time until February 10, 2016 in which to file and serve Respondent's Initial Briefs and Designations of Matter.

Respectfully submitted,



W. ANDREW ARNOLD
SC Bar # 0065311
Law Office of W. Andrew Arnold, P.C.
712 East Washington Street
Greenville, SC 29601
(864) 242-4800
aarnold@aalawfirm.com
Attorney for Respondent David Wilson

Dated December 14th, 2015

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Court of Common Pleas
D. Garrison Hill, Circuit Court Judge

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v.

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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,

and

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

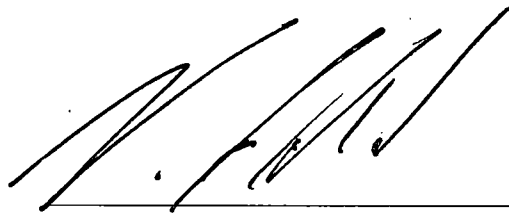
PROOF OF SERVICE

I certify that I have served the Respondent David Wilson's Motion for Extension of Time to File Initial Brief and Designations of Matter, by depositing a copy of the same in the United States Mail, postage prepaid, on December 14, 2015, addressed to the following attorneys of record:

Bruce B. Campbell, Esquire
Horton Law Firm
307 Pettigru St.
Greenville, SC 29601

Burl F. Williams, Esquire
Nexsen Pruet, LLC
P.O. Drawer 10648
Greenville, SC 29603

D. Randle Moody, II
Roe Cassidy Coates & Price, PA
PO Box 10529
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aarnold@aalawfirm.com
Attorney for Respondent David Wilson

Dated December 14, 2015



December 14, 2015

Clerk of Court
SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: David Wilson, et al. v. John Gandis, et al.
Appellate Case Number: 2015-000476

Dear Sir or Madam:

In reference to the above, please find enclosed the original RESPONDENT DAVID WILSON'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATIONS OF MATTER, plus two copies, along with a \$25 filing fee check.

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

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Andrew Arnold'.

W. Andrew Arnold

WAA/jdf
Enclosures

cc: Bruce B. Campbell, Esquire (with enclosure)
D. Randle Moody, II, Esquire (with enclosure)
Burl F. Williams, Esquire (with enclosure)


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COLUMBIA SC 29211-1629**RECEIVED**
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