

78795

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Master-in-Equity

James O. Spence, Master-in-Equity

Appellate Case No.: 2014-000741

RECEIVED

DEC 18 2015

SC Court of Appeals

David R. Gooldy

Respondent,

v.

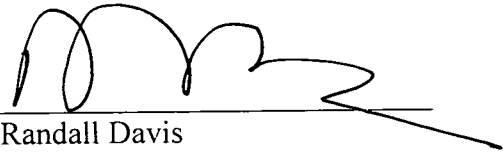
The Storage Center – Platt Springs, LLC.....

Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE A PETITION FOR REHEARING**

YOU WILL PLEASE TAKE NOTICE that the Respondent David R. Gooldy, by and through his undersigned attorneys, hereby move for a fifteen-day extension of time until January 11, 2016, within which to file and serve the Petition for Rehearing. Opinion No. 5366 in this matter was filed on December 9, 2015. This motion is Respondent's first request for extension and is made on the grounds of holiday schedules and work load at the end of this year.

BY:



James Randall Davis
SC Bar No. 1580
DAVIS | FRAWLEY, LLC
140 East Main Street, P.O. Box 489
Lexington, South Carolina 29071
(803) 359-2512

Lexington, South Carolina
December 17, 2015

ATTORNEYS FOR RESPONDENT

Other Counsel of Record:

Robert E. Stepp

Bess J. DuRant

Post Office Box 11449

Columbia, SC 29211

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

DEC 18 2015

APPEAL FROM LEXINGTON COUNTY
Master-in-Equity

SC Court of Appeals

James O. Spence, Master-in-Equity

Appellate Case No.: 2014-000741

David R. Gooldy Respondent,

v.

The Storage Center – Platt Springs, LLC..... Appellant.

PROOF OF SERVICE

I hereby certify that I have served the Respondent’s Motion for Extension of Time within which to File and Serve Petition for Rehearing on the Appellant, by depositing a copy in the United States Mail, postage prepaid, on the 18th day of December, 2015, addressed to its attorneys, Robert E. Stepp and Bess J. DuRant, Post Office Box 11449, Columbia, SC 29211

Counsel for Respondent:

James Randall Davis (SC Bar No. 1580)
DAVIS | FRAWLEY, LLC
140 East Main Street, P.O. Box 489
Lexington, South Carolina 29071
(803) 359-2512