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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APPEAL FROM ADMINISTRATIVE LAW COURT

DEC 18 2015

Ralph King Anderson, III, Chief Administrative Law Judge,

SC Court of Appeals

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 APPELLANT'S REPLY TO  
CITY OF COLUMBIA'S *AMICUS CURIAE* BRIEF**

The undersigned, as counsel for Appellant Kan Enterprises, Inc., d/b/a A 1 Food Stores, hereby moves for a Thirty (30) day extension time to file its Reply Brief to City of Columbia's *amicus curiae* brief. This Motion is made on the grounds that Appellant needs additional time due to the holidays, planned vacation, and very heavy work load.

This is the first extension request for the Reply to *Amicus Curiae* Brief 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 Reply to *Amicus Curiae* Brief to January 24, 2016.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Reply to Amicus Curiae Brief to January 24, 2016.

Respectfully submitted,

By: \_\_\_\_\_

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ATTORNEYS FOR APPELLANT

West Columbia, South Carolina

December 18, 2015

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v.

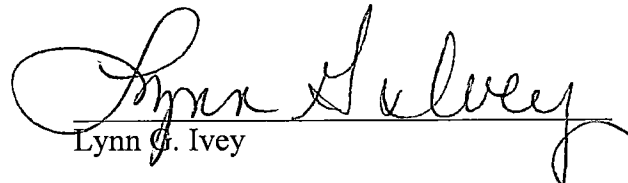
South Carolina Department of Revenue, Ellen Fishburne Triplett,  
Keith McIver, Samuel L. Munson, Jocelyn Munson, and Michael Hill,..... Respondents.

**PROOF OF SERVICE**

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA, certify that I have served the Appellant's Motion for Extension of Time to File Reply to City of Columbia's *Amicus Curiae* Brief by mail, to the following parties by depositing a copy of same in the United States Mail, postage prepaid, on December 18, 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

  
Lynn G. Ivey

West Columbia, South Carolina  
December 18, 2015

December 18, 2015

The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
P.O. Box 11629  
Columbia, SC 2921

RE: Kan Enterprises, Inc., d/b/a A1 Food Stores v. SC Department of  
Revenue, et al  
Appellant No. 2015-000733

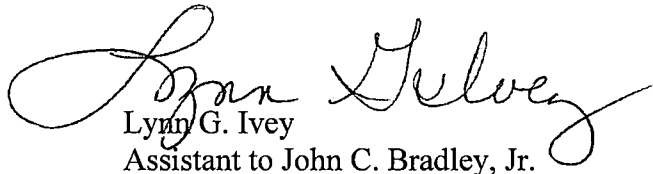
Dear Ms. Kitchings:

Please find attached to this letter the original and three copies of our Motion for Extension of Time with Proof of Service, and our check for \$25.00. Please return the clocked copies via our courier.

By copy of this letter, we are serving opposing counsel of the same.

Thank you for your assistance with this matter.

Respectfully yours,

  
Lynn G. Ivey  
Assistant to John C. Bradley, Jr.

Enclosures

cc: Justine M. Tate, Esquire  
Sean Ryan, Esquire  
Kathleen McDaniel, Esquire

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SC Court of Appeals

S. Jahue Moore†  
J. Mark Taylor\*  
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Sheila McNair Robinson  
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Robert D. Hazel  
OF COUNSEL  
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