

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III

2012-CP-39-01554

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SC Court of Appeals

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Julie Freeman Hair,

Appellant-Respondent,

v.

J.L.H. Investments, LP, aka Hendrick Honda of Easley,

Respondent-Appellant.

JOINT MOTION FOR BRIEFING SCHEDULE AND TO EXCEED PAGE LIMITS

The initial appellants' briefs in this cross-appeal are currently due on May 5, 2014. Due to the lengthy history of this case, the complexity of the issues presented, and the volume of the transcripts from the week-long trial and incidental hearings in this matter, the parties respectfully request a sixty-day extension of time to file initial appellants' briefs and designations of matter to be included in the record on appeal, making them due on July 8, 2014. The parties further request a briefing schedule that provides the parties will have sixty days from service of the other party's initial appellant's brief to file an initial respondent's brief and counter-designation of matter to be included in the record

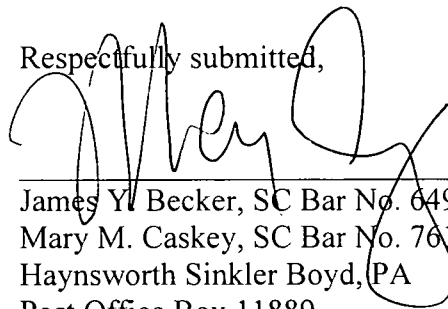
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Joint
Motion

on appeal, and thirty days from service of the initial respondent's brief to file a reply brief and any additional designations of matter to be included in the record on appeal.

In addition, Respondent-Appellant J.L.H. Investments, LP, aka Hendrick Honda of Easley ("Hendrick Honda") moves pursuant to Rule 240, SCACR to exceed the page limitations in Rule 208(b)(5), SCACR for its initial appellant's brief in this appeal. This case has been pending since 2006, culminating in a week-long jury trial. Hendrick Honda anticipates that it will need more than fifty pages to adequately brief the procedural history, facts, and legal arguments to be addressed. For that reason, Hendrick Honda respectfully requests that it be allowed to file an initial appellant's brief not to exceed 75 pages. Appellant-Respondent Julie Freeman Hair similarly requests that she be allowed to file an initial respondent's brief not to exceed 75 pages.

The parties also request that all deadlines be stayed pending resolution of this motion.

Respectfully submitted,



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May 2, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III

Appellate Case No. 2014-000642
C.A. No. 2012-CP-39-01554

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SC Court of Appeals

Julie Freeman Hair,

Plaintiff/Appellant-Respondent,

v.

J.L.H. Investments, LP, aka Hendrick Honda of Easley,

Defendant/Respondent-Appellant.

PROOF OF SERVICE

I certify that I have served the Joint Motion for Briefing Schedule and to Exceed Page Limits, by U.S. Mail, on May 2, 2014, addressed to the following counsel of record:

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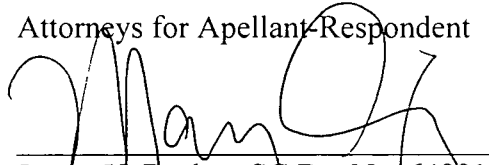
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SC Court of Appeals

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May 2, 2014

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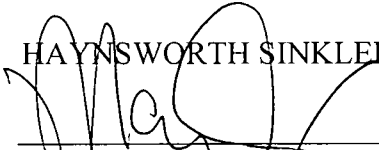
RE: *Julie Freeman v. J.L.H. Investments, LP a/k/a Hendrick Honda of Easley*
Civil Action No. 2012-CP-39-01554
Appellate Case No. 2014-000642
HSB File No. 32239.0001

Dear Ms. Kitchings:

Enclosed for filing are the original and seven copies of the Joint Motion for Briefing Schedule and to Exceed Page Limits and the original and one copy of the corresponding Proof of Service, together with a check for \$25.00. Please file the originals and return the clocked copies to me via my courier.

Very truly yours,

HAYNSWORTH SINKLER BOYD, PA


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May 2, 2014

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