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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM FAIRFIELD COUNTY

DEC 16 2015

Benjamin H. Culbertson, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-001178

Corey Ross, Appellant,

v.

Carolina Adventure World, LLC, Respondent.


MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

The undersigned, as counsel for Corey Ross, hereby moves for a Thirty (30) day extension of time to file its Initial Brief. This Motion is made on the grounds that S. Jahue Moore, the undersigned counsel for Corey Ross, remains under an unusually heavy workload and appearance schedule. Counsel requests additional time to prepare an Initial Brief in this matter.

This is the third extension request for the Initial Brief and is not intended for purposes of delay. Further, this request is not intended to prejudice the opposing party by an extension of time. By the undersigned's calculations, the extension, if granted, would extend Appellant's deadline for filing the Initial Brief and Designation of Matter to January 16, 2016.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of its Initial Brief and Designation of Matter to January 16, 2016.

Respectfully submitted,

By:  FOR
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ATTORNEYS FOR APPELLANT

West Columbia, South Carolina
December 16, 2015

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Court of Common Pleas

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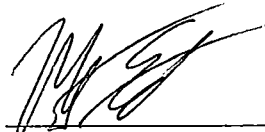
Carolina Adventure World, LLC,, Respondents.

PROOF OF SERVICE

I, Martin A. Ebert, an employee of Moore Taylor Law Firm, PA certify that I have served the Motion for Extension of Time to File Initial Brief, on counsel of record for Respondents in this action by depositing a copy of same in the US Mail, postage prepaid, on December 16, 2015 to:

Christian Stegmaier, Esq.
Meghan Hazelwood Hall, Esq.
COLLINS AND LACY, P.C.
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Martin A. Ebert

West Columbia, South Carolina
December 16, 2015