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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
D. Garrison Hill, Circuit Court Judge

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/Respondents.

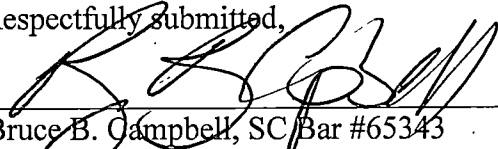
**RESPONDENTS STEVE NORVELL, NEOLOGIC DISTRIBUTION, INC., AND
FRESH WATER SYTEMS, INC.'S MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Respondents Steven Norvell, NeoLogic Distribution, Inc. and Fresh Water Systems, Inc.'s ("NeoLogic Respondents") hereby move the court for a thirty (30) day extension of time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. The grounds for this motion are as follows:

The NeoLogic Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal are due January 8, 2015. As noted by Appellants' in their October 30, 2015, Motion for Extension to file their initial briefs, the trial record in this case contains almost 1,000 pages of testimony and approximately 300 exhibits. Simply reviewing the trial record has proven to be a monumental task. In addition, Christmas holidays, other end-of-year deadlines, and travel plans over the New Year's weekend will make it very difficult for the undersigned to complete the brief and designation by January 8, 2016. An additional thirty (30) days would greatly help the undersigned counsel in the preparation of the initial brief and designation. This is the NeoLogic Respondents' first request for an extension of time to file their initial brief, and the undersigned certifies that this request for a thirty (30) day extension of time is warranted and has not been interposed to delay the case.

The NeoLogic Respondents' therefore respectfully request a thirty (30) day extension of time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. By counsel's calculations, the Initial Brief of Respondent would then be due on or before February 8, 2016.

Respectfully submitted,



Bruce B. Campbell, SC Bar #65343
Horton, Drawdy, Ward, Mullinax & Farry, P.A.
307 Pettigru St.
Greenville, SC 29601
(864) 233-4351
Attorney for Respondents Steven Norvell, NeoLogic
Distribution, Inc. and Fresh Water Systems, Inc.

December 17, 2015

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
D. Garrison Hill, Circuit Court Judge**

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/Appellants,

and

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

PROOF OF SERVICE

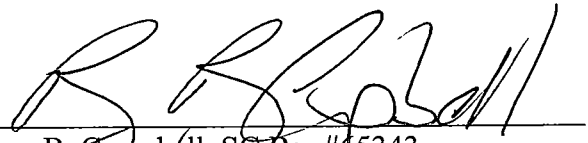
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I certify that I have served Steven Norvell, NeoLogic Distribution, Inc., and Fresh Water Systems, Inc.'s Motion for Extension of Time to File Initial Brief and Designation of Matter by depositing a copy of same in the United States Mail, postage prepaid, on December 17, 2015, addressed to their attorneys of record as follows:

W. Andrew Arnold, Esquire
Law Office of W. Andrew Arnold, P.C.
712 East Washington St.
Greenville, SC 29601

Burl F. Williams, Esquire
Nexsen Pruet, LLC
P.O. Box Drawer 10648
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D. Randle Moody, II, Esquire
Roe Cassidy Coates & Price, PA
P.O. Box 10529
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Attorney for Respondents Steven Norvell, NeoLogic
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OF COUNSEL
JOSEPH M. JENKINS, JR.
RICHARD N. TAPP, P.A.

December 17, 2015

VANCE B. DRAWDY
1928-1997
J. WRIGHT HORTON
1919-2011

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: David Wilson v. John Gandis, et al
Appellate Case No. 2015-000476

Dear Ms. Kitchings:

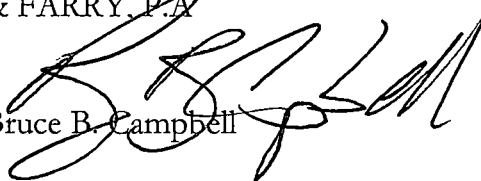
Enclosed please find for filing an original and two (2) copies of Steven Norvell, NeoLogic Distribution, Inc. and Fresh Water Systems, Inc.'s Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal along with the Proof of Service. I have also enclosed a check in the amount of \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope provided.

By copy of this correspondence, I am serving all counsel of record a copy of the motion.

Please feel free to contact me if you have any questions.

Sincerely,

HORTON, DRAWDY, WARD, MULLINAX
& FARRY, P.A.



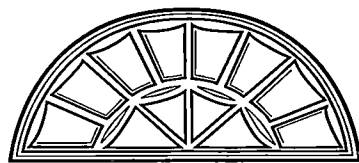
Bruce B. Campbell

BBC/emc
Enclosures

cc: W. Andrew Arnold, Esquire
Burl F. Williams, Esquire
D. Randle Moody, II, Esquire



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HORTON LAW FIRM
HORTON, DRAWDY, WARD, MULLINAX & FARRY, P.A.

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