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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

JAN 11 2016

D. Garrison Hill, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-000778
C/A No. 2013-CP-23-01762

Carol Simpson,

Appellant,

v.

Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc., Defendants,

Of Whom Frank A. Landgraff is the

Respondent.

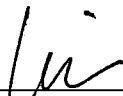
**FRANK A. LANDGRAFF'S FIRST MOTION FOR EXTENSION
OF TIME UNTIL FEBRUARY 20, 2016 TO FILE RESPONSE TO
APPELLANT'S AMENDED INITIAL BRIEF**

Counsel for the Respondent hereby moves for an extension of time until February 20, 2016 in which to serve and file the Respondent's Response to Appellant's Amended Initial Brief in the present case.

This is the first Motion for Extension to Respond to Appellant's Amended Initial Brief and counsel certifies that this request is not intended to cause undue delay and is necessary to properly prepare and present the response to the issues in the case. Due to counsel's present case load, including a large number of briefing and trial commitments, as well as other client commitments, an extension of time until February

20, 2016 to file and serve its response to Appellant's Amended Initial Brief. Respondent has not previously sought an extension of time to respond to Appellant's Amended Initial Brief. Respondent further moves that time be stayed pending a decision on this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
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Attorneys for Frank A. Landgraff

Greenville, South Carolina

January 7, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

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SC Court of Appeals

Carol Simpson,

Appellant,

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Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc., Defendants,

Of Whom Frank A. Landgraff is the

Respondent.

PROOF OF SERVICE

I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

**FRANK A. LANDGRAFF'S FIRST MOTION FOR EXTENSION OF
TIME UNTIL FEBRUARY 20, 2016 TO FILE RESPONSE TO
APPELLANT'S AMENDED INITIAL BRIEF**

Counsel Served:

William G. Mayer
118 West Main Street
Laurens, SC 29360


Lane W. Davis

January 7, 2016

Nelson Mullins

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January 8, 2016

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JAN 11 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
PO Box 11629
Columbia, SC 29211

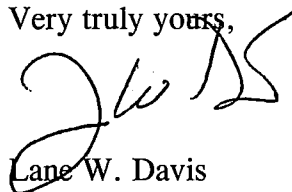
RE: Carol Simpson v. Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc.
Case No. 2013-CP-23-01762
Appellate Case No. 2015-000778

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's First Motion for Extension of Time Until February 20, 2016 to File Response to Appellant's amended Initial Brief in the above-referenced matter. Also enclosed is our check for the filing fee.

Please return a file stamped copy in the enclosed envelope.

Very truly yours,



Lane W. Davis

LWD:ap
Enclosures
cc: William G. Mayer (w/enclosure)

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**Nelson
Mullins**

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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