

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Judge

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JAN 20 2016

SC Court of Appeals

Appellate Court Case No. 2015-002618

Patricia Doller.....Respondent,

v.

Lohr Plumbing, Inc.....Appellant.

**MOTION FOR EXTENSION OF TIME TO SERVE & FILE BRIEF ADDRESSING
APPEALABILITY**

Appellant, Lohr Plumbing, Inc., respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR for a fifteen (15) day extension of time in which to file and serve its Brief addressing the issue of appealability, as requested in Ms. Claire Allen's letter dated, January 12, 2016, which at present is due January 22, 2016. Counsel for Lohr Plumbing, Inc. seeks additional time for drafting and consultation with the client. This motion is not made for the purpose of undue delay, and is the first request for an extension of time.

With the requested extension, Appellant, Lohr Plumbing, Inc.'s Brief would be due
February 8, 2016.

Respectfully Submitted,

TUPPER, GRIMSLEY & DEAN, P.A.

By: 

Stacey P. Canaday (S.C. Bar No. 68805)

Ralph E. Tupper (S.C. Bar No. 5647)

Attorneys for Appellant Lohr Plumbing, Inc.

PROOF OF SERVICE

I certify that I have served Appellant, Lohr Plumbing, Inc.'s Motion for an Extension of Time to file and serve its Brief Addressing the Issue of Appealability, by depositing a copy in the U.S. Mail, postage paid, facsimile, and via electronic mail on January 19, 2016, addressed to Respondent's attorney as set forth below:

Attorneys for Respondent, Patricia Doller

A. Parker Barnes, Jr., Esq.
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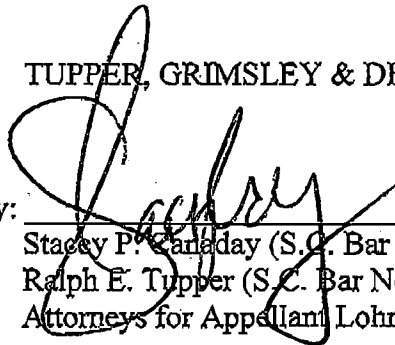
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Beaufort, South Carolina
January 19, 2016

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* ALSO ADMITTED IN NEW YORK

January 19, 2016

VIA U.S. MAIL AND FACSIMILE

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

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JAN 20 2016

SC Court of Appeals

RE: Patricia Doller v. Lohr Plumbing, Inc.
Appellate Case No. 2015-002618

Dear Ms. Kitchings:

Please find enclosed the originals and one (1) copy each of *Motion for Extension of Time to Serve and File Brief Addressing Appealability and Proof of Service* on behalf of Appellant Lohr Plumbing, Inc. with regard to the above captioned matter. I would appreciate it if you would file the originals and return the clocked copies to my office in the self-addressed, stamped envelope provided for your convenience. Also enclosed is this firm's check in the amount of \$25.00 for payment of filing fee.

By copy of this correspondence, together with its enclosures, I am hereby serving a copy of the aforementioned pleading on opposing counsel.

Should you have any questions, please feel free to contact me. If I am unavailable, please ask to speak with my paralegal, Nate Head.

Very truly yours,



Stacey P. Canaday
 SPC/njh
 Enclosures

- cc: The Honorable Michael G. Nettles (via U.S. Mail and email w/encls)
- Ms. Molly C. Stanton, Law Clerk to the Honorable Michael G. Nettles (via email only)
- All Counsel of Record (via U.S. Mail and email w/encls)
- Mr. Joe Stubbs, Auto Owners Insurance Company, Claim No. 72-4827-2011 (via email only)

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FAX COVER SHEET

To: The Honorable Jenny Abbott Kitchings

Fax: (803) 734-1839

From: Stacey P. Canaday

RE: Patricia Doller v Lohr Plumbing, Inc.

No. Pages: 5, including cover sheet

Ms. Kitchings,

Attached please find *Motion for Extension of Time to Serve & File Brief Addressing Appealability and Proof of Service*. Hard copies are being sent via U.S. Mail.

Thank you,

Stacey Canaday

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