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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Case No. 2012-CP-07-4139
APPELLATE CASE NO. 2015-002618

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JAN 22 2016

SC Court of Appeals

Patricia Doller,

Respondent,

v.

Lohr Plumbing, Inc.

Appellants.

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE AND SERVE
MEMORANDUM ADDRESSING APPEALABILITY**

Brian P. Robinson S.C. Bar No. 8814
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Post Office Box 61110
Columbia, South Carolina 29260
(803) 252-7693
Attorney for Respondent

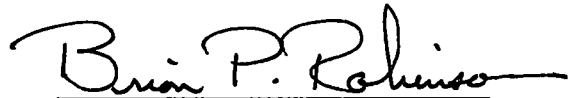
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Attorneys for Appellant

Respondent Patricia Doller respectfully requests a 15-day extension in which to file and serve the requested memorandum discussing whether the Order granting a new trial is appealable. This request is in response to the Appellant's requested 15-day extension. If the Respondent files earlier than the Appellant, then the Appellant has the opportunity to address the Respondent's argument, in effect turning the appellate procedure on its head.

This request is not made for the purpose of delay, as the Appellants' extension has already changed the time of response. The Doller memorandum would be due on February 8, 2016, the same time the Appellant's memorandum is due.

Respectfully submitted,



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January 22, 2016.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
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Michael G. Nettles, Circuit Court Judge

Case No. 2012-CP-07-4139
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Patricia Doller, Respondent,

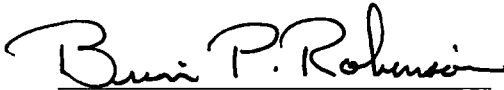
v.

Lohr Plumbing, Inc. Appellants.

PROOF OF SERVICE

I certify that I have served Appellant's counsel, Stacey P. Canaday, Esquire with a copy of the Respondent's Motion for a 15-day Extension in which to File and Serve a Memorandum regarding appealability of the Order granting a new trial by e-mailing her a copy at staceycanaday@tgdpa.com and by mailing a copy, postage paid, to:

Stacey P. Canaday, Esquire
Tupper, Grimsley & Dean, P.A.
P.O. Box 2055
Beaufort, SC 29901


Brian P. Robinson S.C. Bar No. 8814
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Attorney for Respondent

January 22, 2016.

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SC Court of Appeals

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BRYAN M.J. TRIPLETT

* Of Counsel
** Also Admitted in District of Columbia

January 22, 2016

AUTHOR'S E-MAIL: BROBINSON@brunerpowell.com

HAND DELIVERED

The Honorable Jenny Abbott Kithings
Clerk of Court
South Carolina Court of Appeals
John C. Calhoun Building
1015 Sumter Street
Columbia, SC 29201

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JAN 22 2016

SC Court of Appeals

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

Dear Ms. Kithings:

Enclosed please find an original and one copy of the Respondent's Motion for an Extension of Time to File and Serve Memorandum Addressing Appealability, along with the Proof of Service in the above matter. Also enclosed is our check in the amount of \$25.00.

I am serving opposing counsel by e-mail and U.S. Mail with a copy of these documents.

With my kindest regards, I am

Sincerely,



Brian P. Robinson

BPR/os

CC: Stacey P. Canaday, Esquire
A. Parker Barnes, Jr., Esquire