

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Judge

RECEIVED

JAN 15 2016

SC Court of Appeals

Appellate Case No. 2015-002572
Common Pleas Case No. 2015-CP-40-1819

Diamond Assets, LLC,.....Respondent,

v.

Diane F. Candela,.....Appellant.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Andrew S. Radeker
S.C. Bar No. 73743
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Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The deadline for service and filing of Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal is currently January 19, 2016.
2. This is the first extension that the undersigned has sought in this appeal.
3. Appellant's counsel seeks a 30-day extension of this deadline in order to give him time to complete the brief.
4. Appellant's counsel has a jury trial scheduled for next week and needs to use the time between now and then to prepare for that trial.
5. Opposing counsel does not object to the extension sought in this motion.
6. Appellant's counsel believes there is good cause to grant the requested extension.

WHEREFORE Appellant prays for an Order extending the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal by 30 days to February 18, 2016.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. S. Radeker', written over a horizontal line.

Andrew S. Radeker
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(803) 779-2211
Attorney for Appellant

January 15, 2016

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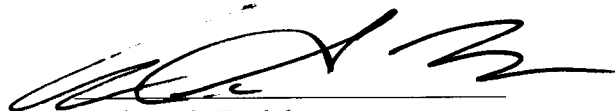
Diane F. Candela,.....Appellant.

PROOF OF SERVICE

I certify that I served the foregoing motion for extension by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

Brian Dumas, Esq.
Brian Dumas, Attorney LLC
718 Clemson Rd.
Columbia, SC 29229

January 15, 2016



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January 15, 2016

VIA HAND DELIVERY

The Hon. Jenny Abbott Kitchings
Clerk of Court, Court of Appeals of South Carolina
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

Re: **Diamond Assets, LLC v. Diane F. Candela**
Appellate Case No. 2015-002572

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced case are an original and seven copies of a motion for extension of time, with attached proof of service thereof. Also enclosed is this firm's check in the amount of \$25.00 as the motion fee.

Kindly file these documents and return a file-stamped copy thereof to the bearer of this letter. Thank you for your attention to this matter. Of course, if you or your staff have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am,

Very truly yours,
HARRISON & RADEKER, P.A.



Andrew S. Radeker

ASR/

Enclosures

cc: Brian Dumas, Esq.