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STATE OF SOUTH CAROLINA
In the Court of Appeals

On Appeal from Charleston County
Court of Common Pleas

Clifton B. Newman, Circuit Judge

Case No. 2066-CP-10-1577
Appellate Case No. 2015-001844

RECEIVED
FEB 10 2016
SC Court of Appeals

Lawton Limehouse, Sr,

Appellant,

v.

Paul H. Hulsey and The Hulsey
Litigation Group, LLC,

Respondents.

Motion for Extension of Time

Pursuant to Rule 240, SCACR, the Respondents Paul H. Hulsey and The Hulsey Litigation Groups, LLC move for an extension of time to file and serve their initial brief and additional designations. In support of the motion, the undersigned Counsel for the Respondents would state:

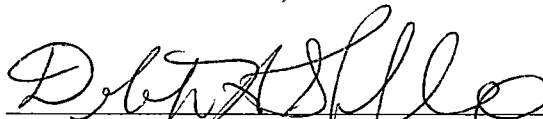
1. The Appellant's Initial Brief and Designations were served on December 10, 2015;
2. The Respondents made a previous request for extension by letter, which was granted by order filed January 13, 2016, in which the Court granted the Respondents a 30-day extension to February 10, 2016, in which to file and serve their initial brief and additional designations;

3. Due to other deadlines and personal commitments dealing with a family health issue, she has not been able to complete the brief; and

5. She has contacted Counsel for the Appellant, Mr. Cisa, who graciously consented to this request as evidenced by a copy of the email correspondence.

Wherefore, for good cause shown, the Respondents respectfully request that the Court grant a 30-day extension to file and serve its initial Respondent's brief and additional designations.

HOOD LAW FIRM, LLC



Deborah Harrison Sheffield, *Of Counsel*, (SC 2757)
172 Meeting Street ~ Post Office Box 1508
Charleston, SC 29402
Phone: (843) 577-4435
Facsimile: (843) 722-1630
Email: Info@hoodlaw.com

Attorneys for the Respondents
Paul H. Hulsey and The Hulsey Litigation
Group, LLC

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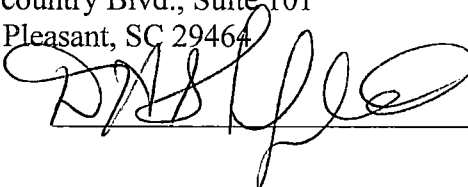
Certificate of Service

FEB 10 2016

SC Court of Appeals

I, Deborah H. Sheffield, Counsel for the Respondents do hereby certify that I have this 8th day of February, 2016, served the foregoing Motion upon the Appellant by depositing a copy in the U.S. Mail, with sufficient first class postage, addressed to their Counsel of Record of as listed below:

Frank M. Cisa
Cisa & Dodds, LLP
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464



February 8, 2016

RE: Limehouse Sr. v. Hulsey - Appeal

Frank Cisa [frank@cisadodds.com]

Sent: Thursday, February 04, 2016 3:37 PM

To: Deborah Sheffield

Cc: Jamie Hood; Collier Jones

Deborah, I have no objection and you can tell them that I consent. They won't look at it for many months. Sorry about your mother. Frank

Frank M. Cisa

Cisa & Dodds, LLP

858 Lowcountry Blvd., Suite 101

Mt. Pleasant, SC

(843)881-6530

fax(843) 881-5433

frank@cisadodds.com

From: Deborah Sheffield [mailto:deborah.sheffield@hoodlaw.com]**Sent:** Thursday, February 04, 2016 3:33 PM**To:** Frank Cisa <frank@cisadodds.com>**Cc:** Jamie Hood <james.hood@hoodlaw.com>; Collier Jones <collier.jones@hoodlaw.com>**Subject:** Limehouse Sr. v. Hulsey - Appeal

Mr. Cisa. Under the current deadline, the Initial Brief of Respondents and Designations for the ROA are due next Wednesday, February 10, 2016. I have been working on the project, but I am concerned that I may not be able to complete it by the due date due to a family health issue (My mother had a fall and I just returned from taking her to a neurosurgeon and he has scheduled her for a procedure next Wednesday). I am planning to file and serve an extension motion tomorrow so I am writing to confer as to whether you have any objection.

Deborah

Deborah Harrison Sheffield, Of Counsel



In Columbia at:

117 Brook Valley Rd.

Columbia, SC 29223

803-419-7837

803-419-3519 FAX

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February 8, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Lawton Limehouse, Sr. v. Paul Hulseley, et al.
Appellate Case Tracking No. 2015-001844

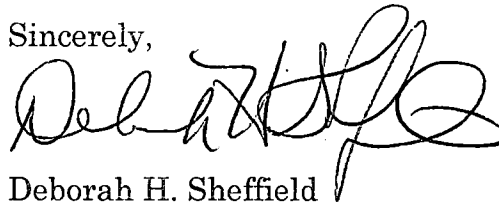
Dear Clerk:

The Appellant's initial brief and designations are due February 10, 2016 pursuant to an extension order. I am enclosing a motion and six copies to ask the Court to grant a second 30-day extension to both Respondents because I do not anticipate that I will be able to complete the brief by that time due to other deadlines and a family health issue. Mr. Cisa has graciously consented as evidence by the enclosed email correspondence.

I am enclosing a check for the \$25.00 filing fee, and I am serving the motion on Mr. Cisa by copy of this letter.

Thank you for your consideration of this request.

Sincerely,



Deborah H. Sheffield

cc: Frank M. Cisa
Cisa & Dodds, LLP
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464

Cherie K. Durand
Hulseley Litigation Group
68 Queen Street
Charleston, SC 29402

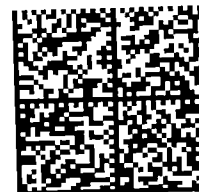
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Hood Law Firm
172 Meeting Street
Charleston, SC 29401

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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