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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM DARLINGTON COUNTY
COURT OF COMMON PLEAS
THE HONORABLE LARRY B. HYMAN, JR.
CIRCUIT COURT JUDGE

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FEB 12 2016

SC Court of Appeals

APPELLATE CASE NO. 2015-001907
CIVIL ACTION NO. 2012-CP-16-00301

Haley Jefferson,
As Personal Representative of the Estate of
Michael Jefferson,

APPELLANT,

versus

Landmark Inn 786 Hospitality, LLC,

RESPONDENT.


MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondent, Landmark Inn 786 Hospitality, LLC, and Designation of Matter to be Included in the Record on Appeal were originally due on January 13, 2016. At the Respondent's request, the Court granted a 30-day extension of time, until February 12, 2016, to serve and file the Respondent's Initial Brief and Designation of Matter. The Respondent, Landmark Inn 786 Hospitality, LLC, respectfully requests the Court to grant a second extension of 14 days, or until Friday, February 26, 2016, to serve and file its Initial Brief of Respondent and Designation of Matter.

Counsel for the Respondent requests a second extension due to the illnesses of children in her care for the past two weeks. In addition, counsel prepared for and presented an argument to the S.C. Supreme Court held on February 10, 2016, as well as prepared various federal and state court motions and pleadings.

Accordingly, the Respondent, Landmark Inn 786 Hospitality, LLC, respectfully requests an additional 14-day extension of time in which to serve and file its Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



Steven J. Pugh
Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR RESPONDENT
LANDMARK INN 786 HOSPITALITY,
LLC**

February 11, 2016.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondent Landmark Inn 786 Hospitality, LLC, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated February 11, 2016, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Kevin M. Barth, Esquire
Ballenger, Barth & Hoefler, L.L.P.
205 North Irby Street
Post Office Box 107
Florence, South Carolina 29503
Counsel for Appellant

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**ATTORNEYS FOR RESPONDENT
LANDMARK INN786 HOSPITALITY,
LLC**

Dated: February 11, 2016.

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

February 11, 2016

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SC Court of Appeals

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

Re: *Haley Jefferson, as Personal Representative of the Estate of Michael Jefferson v. Landmark Inn 786 Hospitality, LLC*
Appellate Case No. 2015-001907
Case No.: 12-CP-16-301
RPR File No.: 7534-035

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Respondent Landmark Inn 786 Hospitality, LLC's Motion for Extension of Time to file the Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on all counsel of record.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

CVG

cc: Kevin M. Barth
Steven J. Pugh



7534-035

RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

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SC Court of Appeals

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Columbia, SC 29211

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