

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

Appellate Case No. 2015-000778
C/A No. 2013-CP-23-01762

Carol Simpson,

Appellant,

v.

Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc., Defendants,

Of Whom Frank A. Landgraff is the

Respondent.

**FRANK A. LANDGRAFF'S SECOND MOTION FOR EXTENSION
OF TIME UNTIL MARCH 8, 2016 TO FILE RESPONSE TO
APPELLANT'S AMENDED INITIAL BRIEF**


Counsel for the Respondent hereby moves for an additional and final extension of time until March 8, 2016 in which to serve and file the Respondent's Response to Appellant's Amended Initial Brief in the present case.

This is the second Motion for Extension to Respond to Appellant's Amended Initial Brief and counsel certifies that this request is not intended to cause undue delay and is necessary to properly prepare and present the response to the issues in the case. Due to personal family matters (and corresponding obligations) coupled with counsel's ongoing case load, an extension of time until March 8, 2016 to file and serve

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Respondent's response to Appellant's Amended Initial Brief is respectfully requested. Respondent has previously sought one prior extension of time to respond to Appellant's Amended Initial Brief but the instant request will be the last. Respondent further moves that time be stayed pending a decision on this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Lane W. Davis, SC Bar No. 68796
E-Mail: lane.davis@nelsonmullins.com
Timothy E. Madden, SC Bar No. 11786
E-Mail: tim.madden@nelsonmullins.com
Reid T. Sherard, SC Bar No. 72536
E-Mail: reid.sherard@nelsonmullins.com
104 South Main Street / Ninth Floor
Post Office Box 10084 (29603-0084)
Greenville, SC 29601
(864) 250-2300

Attorneys for Frank A. Landgraff

Greenville, South Carolina

February 17, 2016

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In The Court of Appeals

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D. Garrison Hill, Circuit Court Judge

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Carol Simpson,

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Frank A. Landgraff, Carol Sutton, Sutton & Associates
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Of Whom Frank A. Landgraff is the

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PROOF OF SERVICE

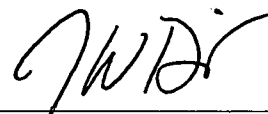
I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

**FRANK A. LANDGRAFF'S SECOND MOTION FOR EXTENSION OF
TIME UNTIL MARCH 8, 2016 TO FILE RESPONSE TO APPELLANT'S
AMENDED INITIAL BRIEF**

Counsel Served:

William G. Mayer
118 West Main Street
Laurens, SC 29360



Lane W. Davis

February 17, 2016

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

104 South Main Street / Ninth Floor / Greenville, SC 29601

Tel: 864.250.2300 Fax: 864.232.2925

www.nelsonmullins.com

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Lane W. Davis

Tel: 864.250.2245

lane.davis@nelsonmullins.com

SC Court of Appeals

February 17, 2016

The Honorable Jenny Abbott Kitchings

Clerk of Court

PO Box 11629

Columbia, SC 29211

RE: Carol Simpson v. Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc.

Case No. 2013-CP-23-01762

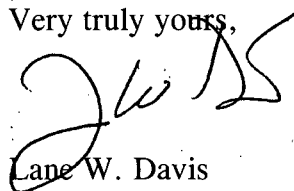
Appellate Case No. 2015-000778

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's Second Motion for Extension of Time Until March 8, 2016 to File Response to Appellant's amended Initial Brief in the above-referenced matter. Also enclosed is our check for the filing fee.

Please return a file stamped copy in the enclosed envelope.

Very truly yours,

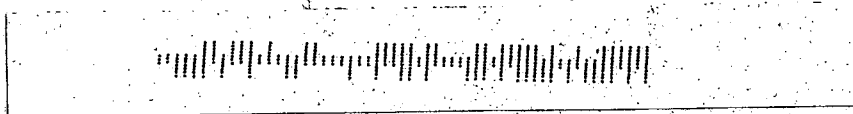


Lane W. Davis

LWD:ap

Enclosures

cc: William G. Mayer (w/enclosure)



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Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

Attention: Lane W. Davis

Post Office Box 10084

Greenville, SC 29603-0084

The Honorable Jenny Abbott Kitchings

Clerk of Court

PO Box 11629

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