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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM DILLON COUNTY
Court of Common Pleas

FEB 26 2016

The Honorable Michael G. Nettles, Circuit Court Judge

99 Court of Appeals

Appellate Case No. 2015-002169
Civil Action No. 2011-CP-17-00413

Guess Farm Equipment Company, Inc. d/b/a Guess
Irrigation Company..... Respondent/Appellant,

v.

Justice Family Farms, LLC, Catfish Bay, LLC, and
Carter Bank & Trust Defendants/Third-Party Plaintiffs,

v.

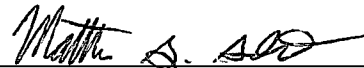
Valmont Industries, Inc. d/b/a Valmont Irrigation
a/k/a Valley Irrigation..... Third Party Defendant,

Of Whom Justice Family Farms, LLC and Catfish
Bay, LLC are Appellants/Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF OF RESPONDENT/APPELLANT**

Pursuant to Rules 263(b) and 240, SCACR, Respondent/Appellant Guess Farm
Equipment Company, Inc. d/b/a Guess Irrigation Company respectfully requests a thirty
(30) day extension of the deadline for filing Appellant's Initial Brief of
Respondent/Appellant. Respondent/Appellant received the second of two transcripts

pertaining to the orders it is appealing on February 2, 2016, and thus is informed and believes its initial brief is currently due March 3, 2016 pursuant to Rule 208(a)(1), SCACR. With the extension, the new deadline would be April 4, 2016 (because April 2, 2016 is a Saturday). The grounds for this request are that the parties are in the midst of settlement negotiations and wish to have additional time to determine if a mutually agreeable resolution can be reached. The undersigned has consulted with Andrew F. Lindemann, Esquire, counsel for Appellants/Respondents, who indicated he has no objection to this request.



Robert T. Strickland, S.C. Bar No. 5389
Matthew G. Gerrald, S.C. Bar No. 76236
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Attorneys for Respondent/Appellant

February 24, 2016

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APPEAL FROM DILLON COUNTY
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a/k/a Valley Irrigation..... Third Party Defendant,

Of Whom Justice Family Farms, LLC and Catfish
Bay, LLC are Appellants/Respondents.

PROOF OF SERVICE

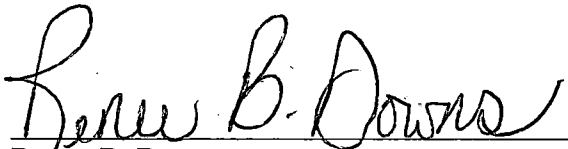
I, the undersigned employee of Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on February 24, 2016, served a copy of the enclosed **MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF OF RESPONDENT/APPELLANT** upon all other parties, through their attorney(s) of record, by depositing copies of the documents in the United States Mail, first class, sufficient postage prepaid, with the return address(es) clearly noted, addressed as follows:

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BARNES ALFORD

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JAMES W. ALFORD
(1930-2008)

February 24, 2016

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FEB 26 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211

Re: Guess Farm Equipment Company, Inc. d/b/a Guess Irrigation Company v.
Justice Family Farms, LLC and Catfish Bay, LLC
Appellate Case No. 2015-002169
BASJ File No. 198.19120

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to File Appellant's Initial Brief of Respondent/Appellant in this matter. Please file the original and six (6) copies of the motion and return one (1) clocked copy in the envelope provided for your convenience. I have also enclosed a check for \$25.00 to cover the filing fee.

By copy of this letter, I am serving all counsel of record with a copies of the motion. Thank you for your assistance in this matter.

With kindest regards, I remain

Very truly yours,

Matthew G. Gerrald

MGG/rbd
Enclosures

cc: Andrew F. Lindemann, Esquire
Samuel F. Arthur, III, Esquire
Robert W. Buffington, Esquire
K. Brett Marston, Esquire/Nicole A. Poltash, Esquire/Glenn W. Pulley, Esquire

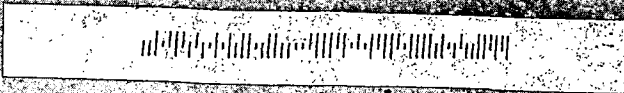
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BARNES/ALFORD

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TO

The Honorable Jenny Abbott Kitchings
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