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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

RECEIVED

MAR 14 2016

SC Court of Appeals

Case No. 2015-001907

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

Appellant

v.

Landmark Inn 786 Hospitality, LLC,

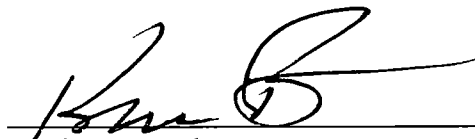
Respondent

MOTION FOR EXTENSION OF TIME

The Appellant, Haley Jefferson, by and through her undersigned attorney, respectfully requests the Court to grant a fourteen (14) day extension of time in which to file Appellant's Reply Brief. Counsel for Appellant received a copy of the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal on March 3, 2016, making the Reply Brief due on March 13, 2016. With a fourteen (14) day extension, the Reply Brief would be due on March 27, 2016.

Counsel for Appellant requests this extension due to his trial schedule, which includes the preparation and participation in an all day medical malpractice mediation. This is counsel's first request for an extension of time to file and serve the Reply Brief. Counsel for Respondent has consented to this request for an extension and her consent is attached to this Motion.

SIGNATURE ON FOLLOWING PAGE

A handwritten signature in black ink, appearing to read 'Kevin M. Barth', is written over a horizontal line.

Kevin M. Barth
Barth, Ballenger & Lewis, LLP
P.O. Box 107
Florence, South Carolina 29503
(843) 662-6301
ATTORNEY FOR APPELLANT

March 11, 2016

Christy Graves

From: Carmen Ganjehsani [CGanjehsani@RichardsonPlowden.com]
Sent: Friday, March 04, 2016 9:24 AM
To: Kevin Barth; Steve Pugh
Subject: RE: Jefferson v. Landmark Inn

If you want an extension to file your reply, please feel free to tell the court you have my consent.

Carmen

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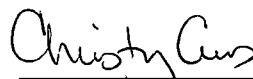
Respondent

CERTIFICATE OF SERVICE

I, the undersigned, of the law offices of Barth, Ballenger, & Lewis, LLP, do hereby certify that I have served all counsel in this action with a copy of the foregoing pleading by causing a copy of the same to be mailed by United States mail, postage prepaid, to the following address(es):

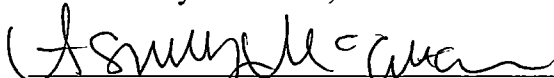
PLEADING: Appellant's Motion for Extension of Time

COUNSEL SERVED: Steven J. Pugh Carmen V. Ganjehsani
P.O. Drawer 7788 P.O. Drawer 7788
Columbia, SC 29202 Columbia, SC 29202



CHRISTY GRAVES
POST OFFICE BOX 107
FLORENCE, SOUTH CAROLINA 29503
(843) 662-6301

Sworn to and subscribed before me
this 11th day of March, 2016



Notary in and for South Carolina

My Commission Expires: 10/24/2024

Barth, Ballenger & Lewis, LLP

Attorneys At Law
205 North Irby Street
Post Office Box 107
Florence, South Carolina 29503
Phone: 843-662-6301
Fax: 843-664-8384
Web: bbllawsc.com

Kevin M. Barth
E. Guy Ballenger
Nicholas W. Lewis
Brendan P. Barth

Michael Ballenger (Retired)

March 11, 2016

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

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VIA FAX # 803-734-1839 AND US MAIL

Re: Haley Jefferson, as Personal Representative of the Estate
of Michael Jefferson v. Landmark Inn 786 Hospitality, LLC
Appellate Case No. 2015-001907

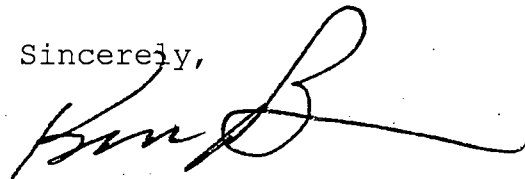
Dear Ms. Kitchings:

Enclosed herewith, please find an original and six copies
of the Appellant's Motion for Extension of Time to file Reply
Brief, along with the appropriate \$25.00 filing fee.

By copy of this letter, I am notifying all counsel of
record of this correspondence.

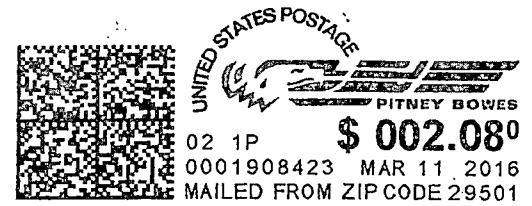
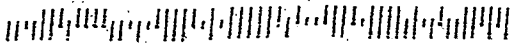
If you have any questions or concerns, please do not
hesitate to contact me.

Sincerely,



Kevin M. Barth
kbarth@hbbh.net

KMB/chg
Enclosure
cc: Carmen V. Ganjehsani
Steven J. Pugh



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205 North Irby Street
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