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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

OCT 09 2012

Appeal From York County  
Court of Common Pleas  
S. Jackson Kimball, Special Circuit Court Judge

**SC Court of Appeals**

Case No. 2009-CP-46-01941

Jackie Hartley, . . . . . Respondent,

v.

A.P. Karras, LLC d/b/a Eat Well Family  
Restaurant, Andrew P. Karagounis,  
Lucas Giannatos and Stacey Giannatos

of whom  
Lucas Giannatos and Stacey Giannatos are. . . Appellants.

**MOTION FOR EXTENSION OF TIME**

**COMES NOW** respondent Jackie Hartley ("Hartley") through his undersigned counsel and pursuant to Rules 240 and 263(b), SCACR, and respectfully requests an extension of time to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Appellants served their Amended Initial Brief of Appellants ("Amended Brief") on September 10, 2012. Hartley respectfully requests that the Court grant a thirty-day extension of time, or until November 9, 2012, for serving and

1st  
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filing the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

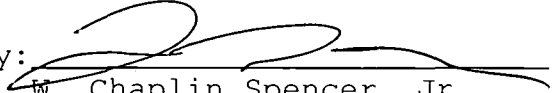
Counsel for Hartley requests this extension because of heavy workload. This is Hartley's first request for an extension of time since receipt of the Amended Brief of Appellants and second request overall in this appeal.

**WHEREFORE,** the undersigned counsel for Hartley respectfully requests a thirty-day extension of time in which to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

October 8<sup>th</sup>, 2012

By:

  
W. Chaplin Spencer, Jr.  
Jeremy D. Melville  
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ATTORNEYS FOR RESPONDENT  
JACKIE HARTLEY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal From York County  
Court of Common Pleas  
S. Jackson Kimball, Special Circuit Court Judge

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Case No. 2009-CP-46-01941

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**PROOF OF SERVICE**

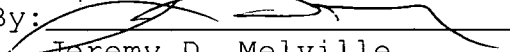
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I certify that I have served the foregoing Motion for Extension of Time has been served by depositing a copy thereof in the United States Mail, postage prepaid, on October 8<sup>th</sup>, 2012, addressed to:

John Martin Foster  
223 East Main Street, Suite 520  
P.O. Box 106  
Rock Hill, SC 29731

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**SC Court of Appeals**

SPENCER & SPENCER, P.A.

By:   
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Rock Hill, SC 29731

ATTORNEYS FOR RESPONDENT

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October 8, 2012

**Via Federal Express Overnight**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

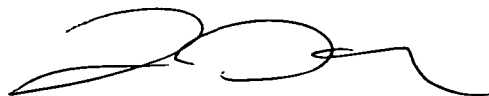
**Re: Jackie Hartley v. A.P. Karras, LLC d/b/a Eat Well Family  
Restaurant, Andrew P. Karagounis, Lucas Giannatos and Stacey  
Giannatos  
Case No. 2009-CP-46-01941**

Dear Ms. Kitchings:

Enclosed please find the following documents relating to the appeal referenced above: (1) an original and six (6) copies of Respondent's Motion for Extension of Time; (2) a Proof of Service; and (3) a check in the amount of \$25.00 for the motion fee. Please contact me if you have any questions or concerns. Thank you for your assistance.

Respectfully,

SPENCER & SPENCER, P.A.



Jeremy D. Melville

cc: John Martin Foster, Esq. (via U.S. mail)

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**SC Court of Appeals**