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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM JASPER COUNTY
Court Of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2016-000041

Marry Wiggins, as Personal Representative of Kelvin Marquise Wiggins,Appellant,

v.

Enterprise Leasing Company-SouthEast, LLC,.....Respondent.

RESPONDENT'S MOTION FOR EXTENSION OF
TIME TO FILE ITS INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL

Pursuant to Rule 240 of the South Carolina Rules of Appellate Practice, Respondent Enterprise Leasing Company-SouthEast, LLC (hereinafter "Respondent") moves this Court for an Order granting an extension of time during which to file its Initial Brief and Designation Of Matter To Be Included In The Record On Appeal. For the reasons set forth below, Respondent requests an additional period of thirty days from June 1, 2016, during which to file these documents.

The additional time requested, beyond the extension of time previously granted by the Court, is warranted given the complexity of the legal issues presented. The thirty-day extension will not prejudice Respondent or Appellant or affect their legal rights. Counsel for Appellant has been consulted and consents to this motion.

Respondent intends to work diligently and to file its Initial Brief and Designation Of Matter as soon as practicable. However, for the reasons stated above, Respondent respectfully requests that the Court grant a thirty-day extension of time during which it may file its Initial Brief and Designation Of Matter.

May 24, 2016

By: *Brittany J. Boykin /cck*
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ATTORNEYS FOR RESPONDENT

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PROOF OF SERVICE

I certify this 24th day of May 2016 that I have served a copy of Respondent's Motion For Extension Of Time To File Its Initial Brief And Designation Of Matter To Be Included In The Record On Appeal upon other counsel of record, by mailing same, postage prepaid in the United States mail, addressed to the following:

Darrell T. Johnson, Jr., Esquire
Warren Paul Johnson, Esquire
Joshua R. Fester, Esquire
Law Office of Darrell Thomas Johnson, Jr.
P. O. Box 1125
300 Main Street
Hardeeville, SC 29927

ATTORNEYS FOR APPELLANT

(Signature page to follow.)

May 24, 2016

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SC Court of Appeals

HAND DELIVERY:

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Marry Wiggins, as Personal Representative of Kelvin Marquise Wiggins v. Enterprise Leasing Company-SouthEast, LLC
Appellate Case No.: 2016-000041
File No.: 9594.142

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's Motion For Extension Of Time To File Its Initial Brief And Designation Of Matter To Be Included In The Record On Appeal regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof of Service and our check for the filing fee. Please file the original filings and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Brittany Boykin

BB/nlh

Enclosures

cc: Darrell T. Johnson, Jr., Esquire
Warren Paul Johnson, Esquire
Joshua R. Fester, Esquire
(w/enc.)