

**RICHARDSON
PLOWDEN**
ATTORNEYS AT LAW

79862
COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202
1900 Barnwell St., Columbia, SC 29201 P 803.771.4400 F 803.779.0016

MYRTLE BEACH P.O. Box 3646 • Myrtle Beach, SC 29578
2103 Farlow St., Myrtle Beach, SC 29577 P 843.448.1008 F 843.448.1533

CHARLESTON P.O. Box 21203 • Charleston, SC 29413
171 Church St., Suite 150, Charleston, SC 29401 P 843.805.6550 F 843.805.6599

www.richardsonplowden.com

RECEIVED

Reply to: Carmen V. Ganjehsani
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

JUN 13 2016

June 10, 2016

SC Court of Appeals

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

Re: *Joseph W. Owens v. Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler, and Dennis Tyndall*
Appellate Case No. 2016-000068
Case No.: 2015-CP-32-00170
RPR File No.: 2047-332

Dear Ms. Kitchings:

As counsel for the Respondents Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler, and Dennis Tyndall, we respectfully request a 30-day extension of time in which to serve and file our Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal. The Brief and Designations are currently due on Wednesday, June 15, 2016. However, with a 30-day extension of time, they would be due on Friday, July 15, 2016.

We find it necessary to request this extension due to our workload, which has included the preparation and filing of briefing with the United States Court of Appeals for the Fourth Circuit, a summary judgment motion with the District Court of South Carolina, and the preparation of a bankruptcy appeal to be filed with the District Court of South Carolina. In addition, the undersigned took personal leave at the end of May and beginning of June for childcare related concerns. This is our first request for an extension of time to serve and file the Initial Respondents' Brief and Designation of Matter.

I am enclosing the \$25.00 filing fee and thank you for your consideration of this request. By copy of this letter, I am notifying counsel of record of this correspondence.

Sincerely,



Carmen V. Ganjehsani

CVG
Enclosure

The Honorable Jenny Abbott Kitchings

June 10, 2016

Page 2

cc: Stephen "Chip" Burn, Esq.
Andrew F. Lindemann, Esq.
Robert F. Goings, Esq.
David A. Anderson, Esq. (via e-mail)

2047-332

RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

COLUMBIA

SC 290

JUN 13 2016

FW 1 L

Hasler

FIRST-CLASS MAIL

06/10/2016

US POSTAGE

\$000.46⁵



ZIP 29201

011E11670150

RECEIVED

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

JUN 13 2016
SC Court of Appeals

29211-162929

