

798U

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

JUN 13 2016

APPEAL FROM THE BEAUFORT COUNTY
Court of Common Pleas

SC Court of Appeals

Honorable Eugene Griffith, Jr., Presiding Judge

Case Nos.: 2014-CP-07-02102
2015-CP-07-00249

Vend Lease Company, Inc.,

Respondent

v.

The Market Place News, LLC and
Tae Suk Holmes,

Appellants.

NOTICE OF MOTION AND MOTION FOR
EXTENSION OF TIME TO FILE APPELLANTS' INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED
IN RECORD ON APPEAL

The Appellants would respectfully request an extension of time within which to file the Initial Brief of the Appellants and the Appellants' Designation of Matter to be Included in the Record on Appeal. These matters are currently due to be filed no later than June 11, 2016. The Appellant would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Respondent.

It is accordingly respectfully requested that the Appellants be granted a thirty (30) day extension of time in which to file the Appellants' Initial Brief and the Appellants' Designation of Matter to be Included in the Record on Appeal.

MOSS, KUHN & FLEMING, P.A.

By: 

H. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina
June 9, 2016

Attorneys for Appellant

RECEIVED

JUN 13 2016

SC Court of Appeals


CERTIFICATE OF SERVICE

Undersigned certifies that the Notice of Motion and Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter to be Included in Record on Appeal, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Paul H. Hoefler, Esquire
Robinson, McFadden & Moore, PC
Post Office Box 944
Columbia, SC 29202

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on June 9, 2016.

MOSS, KUHN & FLEMING, P.A.

By:  _____
Sue Radford

LAW OFFICES

MOSS, KUHN & FLEMING, P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*

KIMBERLY L. SMITH

*ALSO MEMBER OF GA BAR

1501 North Street P.O. Drawer 507 - Beaufort, South Carolina 29901-0507
TELEPHONE 843-524-3373
FAX 843-524-1302

RECEIVED
JUN 13 2016
SC Court of Appeals

June 9, 2016

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Vend Lease Company, Inc. v. The Market Place News, LLC and Tae Suk Holmes
Case Nos.: 2014-CP-07-02102 and 2015-CP-07-00249
Appellate Case No.: 2016-000218

Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter along with my firms check in the amount of \$25.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of the motion on Paul H. Hoefler, Esquire, attorney for the Respondent.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.

H. Fred Kuhn, Jr.

HFKjr:sr
Enclosures

cc: Paul H. Hoefler, Esquire (w/enclosure)

HKF
MOSS, KUHN & FLEMING
ATTORNEYS AT LAW
1501 North Street
P.O. Drawer 507
Beaufort, SC 29901-0507
(843) 524-3373

T. Holmes

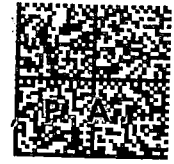
To:

RECEIVED

JUN 13 2016

SC Court of Appeals

Honorable Jenny Abbott ~~Kochings~~
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211



02 1R
0002009735 JUN 09 2016
MAILED FROM ZIP CODE 29902

\$ 01.78⁰

