

8

80227

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

JUL 14 2016

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

Robert E. Hood, Circuit Court Judge

Appellate Case Number: 2015-002054
Case No. 2007-CP-40-0576

In re: Tony Megna, Respondent,

James A. Anasti Appellant,

v.

Lance Wilson, Willis
Goodwin, Gina L. Anasti Lee,
and Richland County Clerk of
Court Defendants.

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO SERVE
RECORD ON APPEAL**

Appellant James A. Anasti respectfully requests an extension of time to serve the Record on Appeal which is currently set to be served by July 20, 2016. Respondent served his Initial Brief and Designation of Matter on June 20, 2016 as reflected on his Proof of Service which has been filed with this Court.

Grounds for this motion are as follows:

- 1) Counsel for James A. Anasti has a very involved federal civil trial before the Honorable Joseph Anderson (Ballard v. Combis, et al., 0:14-01839-

JFA) which is set to start on July 12, 2016 and is expected to take at least a week, if not more.

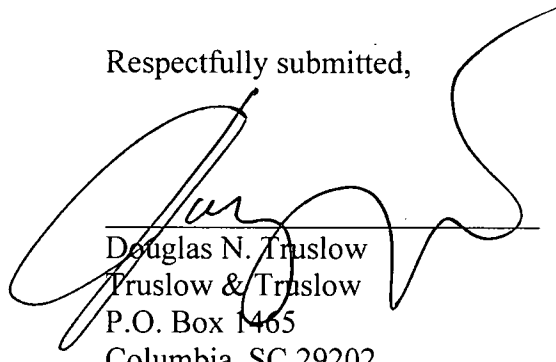
- 2) Counsel additionally has a federal sentencing that requires considerable preparation that will involve the aid of medical professionals (U.S. v. Hipp; 3:14-554-JMC) and objections to a Presentence Report in the matter of U.S. v. Sumter, 3:14-604-JFA, all due and/or occurring within in the same general time frame.
- 3) Counsel for Appellant has conferred with opposing counsel in this matter and they have indicated (see attached email) they have no objection to this request.

Counsel has been preparing for this involved trial for some time and feels that due to the length and scope of the trial as well as the number of documents which have been designated, he will not have time to complete the Record on Appeal and have it served upon opposing counsel by the current deadline of July 20, 2016 such that he would request an additional 15 days' time to prepare and serve the Record on Appeal. Appellant would propose a due date of August 4, 2016 for service.

(Signature on following page.)

July 11, 2016

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Douglas N. Truslow', is written over a horizontal line.

Douglas N. Truslow
Truslow & Truslow
P.O. Box 1465
Columbia, SC 29202
(803) 256-6276
SC BAR: 5642
Attorney for Appellant

Amanda Hilley

From: Ariail E. King <aek@LewisBabcock.com>
Sent: Monday, July 11, 2016 10:55 AM
To: Amanda Hilley; JMG Contact
Cc: Douglas Truslow
Subject: RE: Request for extension to serve the record on appeal in Anasti/Megna matter

I have conferred with Jim and we have no objections to an extension.

ARIAIL E. KING
ATTORNEY AT LAW



Lewis Babcock L.L.P.
1513 Hampton Street (29201)
P.O. Box 11208
Columbia, SC 29211
o. 803.771.8000 f. 803.733.3541
AEK@lewisbabcock.com
www.lewisbabcock.com

From: Amanda Hilley [mailto:amandahilley@truslowlaw.com]
Sent: Monday, July 11, 2016 10:21 AM
To: Ariail E. King <aek@LewisBabcock.com>; JMG Contact <jgriffin@griffindavislaw.com>
Cc: Douglas Truslow <douglastruslow@truslowlaw.com>
Subject: Request for extension to serve the record on appeal in Anasti/Megna matter

Ms. King and Mr. Griffin:

Mr. Truslow has a federal civil trial scheduled to start before Judge Anderson tomorrow, July 12, 2016 (Ballard v. Combis, et al., 0:14-01839 JFA) that is expected to last at *least* a week. In addition to that we have a federal sentencing and objections to a PSR in a federal criminal matter all due within the same time period (U.S. v. Hipp; 3:14-554-JMC and U.S. v. Sumter; 3:14-604-JFA). May I state in the motion for extension to serve the Record on Appeal that you all have no objections to our request?

I hope that you all are having a good summer and staying cool.

Sincerely,

Amanda Douglas Hilley
Senior Paralegal

Truslow & Truslow
ph (803) 256-6276
fax (803) 256-7659

Mailing Address:
P.O. Box 1465
Columbia, SC 29202

Physical Address:
914 Richland St., Suite B-102

CONFIDENTIAL & PRIVILEGED

Unless otherwise indicated or obvious from the nature of the above communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic or otherwise, which you may have of this communication.

CONFIDENTIALITY NOTICE: This e-mail message is intended only for the personal and confidential use of the designated recipient(s) named above and may contain work product and/or attorney-client information, which is privileged, confidential or otherwise exempt from disclosure under applicable law. If you are not a named recipient, **YOU ARE HEREBY NOTIFIED** that any review, dissemination, distribution, disclosure or copying of this message and/or attachments is **STRICTLY PROHIBITED**. If you have received this e-mail message in error, please notify us immediately at the telephone number listed above to arrange for the return and/or deletion of the original message. Thank you for your cooperation.

RECEIVED

JUL 14 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2015-002054
Case No. 2007-CP-40-0576

In re: Tony Megna, Respondent,
James A. Anasti Appellant,

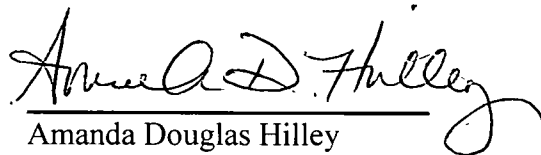
v.

Lance Wilson, Willis
Goodwin, Gina L. Anasti Lee,
and Richland County Clerk of
Court Defendants.

PROOF OF SERVICE

I Amanda Douglas Hilley, Paralegal for Truslow & Truslow Law Firm certify that I have served **Appellant's Motion for Extension of Time to Serve the Record on Appeal** on Respondent Tony Megna by depositing a copy of them in the United States Mail, postage prepaid, on **July 11, 2016**, addressed to his attorneys of record, James Griffin, Esquire of Griffin|Davis, P.O. Box 999, Columbia, SC 29202, and Ariail King, Esquire, of Lewis, Babcock & Griffin, LLP, 1513 Hampton Street, Columbia, SC 29201.

July 11, 2016



Amanda Douglas Hilley
Paralegal

Truslow & Truslow

Attorneys At Law

www.truslowlaw.com

Telephone: 803-256-6276 Fax: 803-256-7659

RECEIVED

JUL 14 2016

SC Court of Appeals

Douglas N. Truslow
douglastruslow@truslowlaw.com

Neal D. Truslow
nealtruslow@truslowlaw.com

Physical Address:
914 Richland Street, Suite B-102
Columbia, SC 29201

Mailing Address:
P.O. Box 1465
Columbia, SC 29202

July 11, 2016

Re: **In re: Tony Megna (Anasti v. Wilson)**
Appellate Case No.: 2015-002054


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

Dear Ms. Kitchings:

Please see the original and one (1) copy of the enclosed *Motion for Extension of Time to Serve the Record on Appeal* and the *Proof of Service* of same as well as the requisite \$25.00 filing fee. Please file same and return the clocked copies in the self-addressed and stamped envelope enclosed.

By copy of this letter, I am serving same upon opposing counsel.

Sincerely,

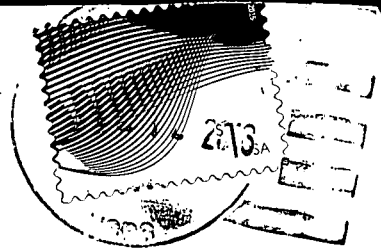

Amanda Douglas Hilley
Paralegal for Douglas N. Truslow

cc: James M. Griffin, Esquire
Ariail E. King, Esquire

Truslow & Truslow

Attorneys At Law

P.O. Box 1465
Columbia, South Carolina 29202



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