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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

JUL 05 2016

D. Garrison Hill, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2013-23-01762

Carol Simpson, Appellant,

v.

Frank A. Landgraff, Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT
FRANK A. LANDGRAFF'S RETURN TO APPELLANT'S
MOTION TO STRIKE RESPONDENT'S BRIEF

Timothy E. Madden
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Greenville, SC 29601
(864) 250-2300

Attorneys for Respondent
Frank A. Landgraff


Counsel for the Respondent, Frank A. Landgraff ("Landgraff"), hereby moves for an extension of time in which to serve and file his return to Appellant's Motion to Strike Respondent's Brief ("Appellant's Motion") in the present case.

Due to counsel's present case load, including a large number of briefs, court appearances, and other client commitments, along with the intervening holiday causing counsel to be out of state, an extension of time is necessary to respond to the issues raised by Appellant's Motion.

The undersigned counsel certifies that this request is not intended to cause undue delay and is necessary to prepare and present a proper response on the part of Respondent.

Landgraff moves for an additional ten (10) days to file his Return to Appellant's Motion. The new due date for Landgraff's Return would be July 15, 2016. Landgraff further moves that the time period for filing his Return be stayed pending a decision on this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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Attorney for Frank A. Landgraff

Greenville, South Carolina

7/5, 2016

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Frank A. Landgraff, Respondent.

PROOF OF SERVICE

I, the undersigned administrative assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT
FRANK A. LANDGRAFF'S RETURN TO APPELLANT'S
MOTION TO STRIKE RESPONDENT'S FINAL REPLY BRIEF

Counsel Served:

William G. Mayer
118 West Main Street
Laurens, SC 29360

A handwritten signature in cursive script, reading "Lisa P. Whitehurst", written over a horizontal line.

Lisa P. Whitehurst
Administrative Assistant

July 5, 2016

Nelson Mullins

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July 5, 2016

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, SC 29211

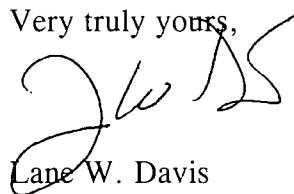
RE: Carol Simpson v. Frank Landgraff
Appellate Case No. 2015-000778
NMRS File No. 35353/01502

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of a Motion for an Extension of Time to File Respondent Frank A. Landgraff's Return to Appellant's Motion to Strike Respondent's Brief in the above-referenced matter. Also enclosed is our check for the filing fee.

Please return a file stamped copy to our courier.

Very truly yours,



Lane W. Davis

LWD:ap
Enclosures
cc: William G. Mayer (w/enclosure)

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