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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY JUL 18 2016  
Court of Common Pleas

**SC Court of Appeals**

D. Garrison Hill, Circuit Court Judge

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  
Lane W. Davis  
Reid T. Sherard  
Nelson Mullins Riley & Scarborough, LLP  
104 South Main Street  
Poinsett Plaza, Suite 900  
P.O. Box 10084 (29603)  
Greenville, SC 29601  
(864) 250-2300

Attorneys for Respondent  
Frank A. Landgraff

Counsel for the Respondent, Frank A. Landgraff ("Landgraff"), hereby moves for a second 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 personal, family obligations, 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 26, 2016. Landgraff further moves that the time period for filing his Return be stayed pending a decision on this motion. No further extension of time will be requested.

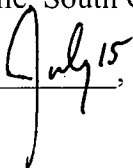
NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Lane W. Davis  
SC Bar No. 68796  
E-Mail: [lane.davis@nelsonmullins.com](mailto:lane.davis@nelsonmullins.com)  
Timothy E. Madden  
SC Bar No. 11786  
E-Mail: [tim.madden@nelsonmullins.com](mailto:tim.madden@nelsonmullins.com)  
Reid T. Sherard  
SC Bar No. 72536  
E-Mail: [reid.sherard@nelsonmullins.com](mailto:reid.sherard@nelsonmullins.com)  
104 South Main Street / Ninth Floor  
Post Office Box 10084 (29603-0084)  
Greenville, SC 29601  
(864) 250-2300

Attorney for Frank A. Landgraff

Greenville, South Carolina

  
July 15, 2016

THE STATE OF SOUTH CAROLINA  
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Court of Common Pleas

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PROOF OF SERVICE

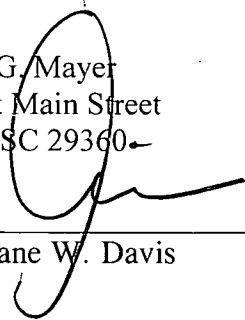
I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid,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

  
\_\_\_\_\_  
Lane W. Davis

July 15, 2016

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP  
Attorneys and Counselors at Law  
104 South Main Street / Ninth Floor / Greenville, SC 29601  
Tel: 864.250.2300 Fax: 864.232.2925  
www.nelsonmullins.com

Lane W. Davis  
Tel: 864.250.2245  
lane.davis@nelsonmullins.com

July 15, 2016

Via-Regular Mail

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

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SC Court of Appeals

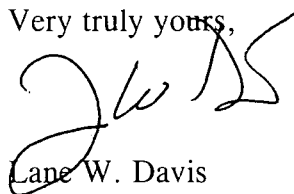
RE: Carol Simpson v. Frank Landgraff  
Appellate Case No. 2015-000778  
NMRS File No. 35353/01502

Dear Ms. Kitchings:

Enclosed please find the original and one copy 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 \$25.00 check for the filing fee.

Please return a file-stamped copy to us in the enclosed return envelope.

Very truly yours,



Lane W. Davis

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

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

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JUL 18 2016

The Honorable Jenny Abbott Kitchens

Clerk of Court

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SC Court of Appeals

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