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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM LEXINGTON COUNTY
COURT OF COMMON PLEAS
THE HONORABLE TANYA A. GEE
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2016-000068
CIVIL ACTION NO. 2015-CP-32-00170

Joseph W. Owens,

APPELLANT,

versus

Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley,
Boyd J. Jones, Tommy G. Parler, Eric L. Fowler, Dennis
Tyndall, Ashley S. Hunter and McKay Public Affairs, LLC,

DEFENDANTS,

Of whom Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley,
Boyd J. Jones, Tommy G. Parler, Eric L. Fowler, and
Dennis Tyndall are the

RESPONDENTS.

MOTION FOR EXTENSION OF TIME

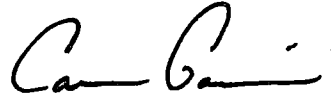
The Initial Brief of Respondents, Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler, and Dennis Tyndall, and Designation of Matter to be Included in the Record on Appeal were originally due on June 15, 2016. At the Respondents' request, the Court granted a 30-day extension of time, until July 15, 2016, to serve and file the Respondents' Initial Brief and Designation

of Matter. The Respondents respectfully request the Court to grant a second extension of one week, or until Friday, July 22, 2016, to serve and file their Initial Brief of Respondents and Designation of Matter.

This request is due to Respondents' counsel's workload, which included the filing of briefs with the United States District Court for South Carolina on July 5, 2016 and July 11, 2016.

Counsel for Respondents has contacted Appellant's counsel and he consents to this request as evidenced by the attached Exhibit "A."

Accordingly, the Respondents respectfully request an extension of time until July 22, 2016 in which to serve and file their Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal.



David A. Anderson
Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
ATTORNEYS FOR RESPONDENTS

July 13, 2016.

EXHIBIT "A"

Carmen Ganjehsani

From: Chip Burn <cburn@burnlawfirmllc.com>
Sent: Monday, July 11, 2016 2:21 PM
To: Carmen Ganjehsani
Subject: Re: Owens v. West Columbia

No problem, Carmen. You've got my consent.

See you soon - Chip Burn

Sent from my iPhone

On Jul 11, 2016, at 11:04 AM, Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com> wrote:

Chip,

Would you consent to my request for a one week extension until July 22, 2016 to file the Initial Respondent's Brief and Designations? I filed a brief last Tuesday, and then another brief today. I work part-time so I would appreciate another week to complete this one.

Thank you in advance for your consideration,

Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Special Counsel Cganjehsani@RichardsonPlowden.com	
<image001.jpg>	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com	

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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondents, Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler, and Dennis Tyndall, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated July 13, 2016, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Stephen "Chip" Burn
BURN LAW FIRM, LLC
945 East Main Street, Suite D
Lexington, SC 29071
Attorney for Appellant

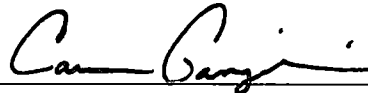
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Andrew F. Lindemann
DAVIDSON & LINDEMANN, PA
Post Office Box 8568
Columbia, SC 29202-8568

Robert F. Goings
GOINGS LAW FIRM
P. O. Box 436
Columbia, SC 29202



Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
ATTORNEYS FOR RESPONDENTS

Dated: July 13, 2016.

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

July 13, 2016

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

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SC Court of Appeals

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:

I am enclosing for filing the original and six copies of the Respondents' Motion for Extension of Time to file the Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on counsel for the Appellant.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

CVG
Enclosures

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

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2047-332

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

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

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