

80617

RECEIVED

AUG 05 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Case No. 2015-002361

Ida Lord.....Plaintiff/Appellant.

v.

D & J Enterprises, Inc. ....Defendant/Respondent.

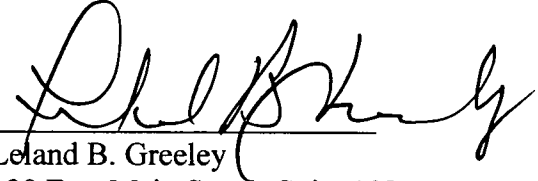
**RESPONDENT'S MOTION FOR EXTENSION OF TIME**

COMES NOW THE RESPONDENT, D & L Enterprises, Inc., by and through its undersigned counsel of record, and does hereby move for a thirty (30) extension of time to file and serve its initial brief and response to Appellant's Designation of Matter to be included in the record. These filings are due on August 5, 2016 and requests that the new date for filing be September 6, 2016 (The 5<sup>th</sup> being a legal holiday). petition this Court for a rehearing on the above-captured matter following the Court's filing of its ruling on April 9, 2014 in this case.

This petition is filed pursuant to Rule 221 (a) of the SCACR. Appellant submits this Court either overlooked or misapprehended the following points in the determination of its filed ruling.

WHEREFORE the Respondent respectfully requests this motion be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leland B. Greeley", written over a horizontal line.

Leland B. Greeley  
128 East Main Street, Suite 102  
Post Office Box 2981  
Rock Hill, South Carolina 29732  
(803) 329-0088 S.C. Bar # 7850  
Attorney for Respondent D & J  
Enterprises, Inc.

August 3, 2016

**LELAND B. GREELEY, P.A.  
ATTORNEY**

128 EAST MAIN STREET, SUITE 102  
ROCK HILL, SOUTH CAROLINA

Post Office Box 2981  
Rock Hill, SC 29732

(803)329-0088  
FAX: (803)329-4310

E Mail: LGreeley@lbgreeleylaw.com

**RECEIVED**  
AUG 05 2016  
SC Court of Appeals

August 3, 2016

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

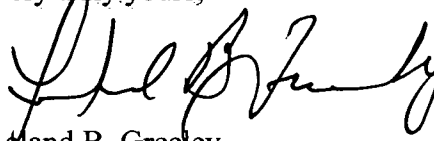
RE: Ida Lord v. D & J Enterprises, Inc., d/b/a Cash on the Spot

Dear Ms. Kitchings:

Please find enclosed the original, along with 7 copies, of Respondent's Motion for an Extension of Time, accompanying Affidavit, and Certificate of Service, as well as the \$25.00 filing fee. Please return to me the date stamped copy of the documents in the enclosed self-addressed stamped envelope.

With kindest regards, I remain

Very truly yours,

  
Leland B. Greeley

/adt

Enclosures

cc: Authur K. Aiken

✓

THE STATE OF SOUTH CAROLINA

RECEIVED

In The Court of Appeals

AUG 05 2016

APPEAL FROM YORK COUNTY  
Court of Common Pleas

SC Court of Appeals

Daniel D. Hall, Circuit Court Judge

Case No. 2015-002361

Ida Lord.....Plaintiff/Appellant.

v.

D & J Enterprises, Inc. ....Defendant/Respondent.

**AFFIDAVIT OF COUNSEL FOR RESPONDENT'S MOTION FOR  
EXTENSION OF TIM**

I, Leland B. Greeley, being duly sworn do state:

1. I am counsel of record for the Respondent in this matter;
2. I am requesting an extension of time to file and serve the Initial Brief of the Respondent and reply to the Designation of matter.
3. During the month of July I had vacation and also two trials and did not appropriate sufficient time for preparation of the above documents.

Further Affiant sayeth naught.

*[Handwritten Signature]*  
Leland B. Greeley

Sworn to and subscribed before me  
This 3<sup>rd</sup> day of August, 2016

*[Handwritten Signature]*  
Notary Public of South Carolina



THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Case No. 2015-002361

Ida Lord.....Plaintiff/Appellant.

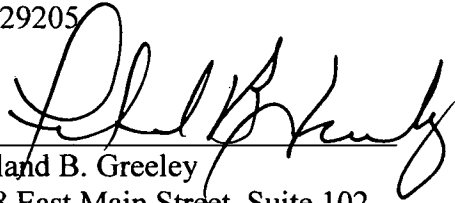
v.

D & J Enterprises, Inc. ....Defendant/Respondent.

CERTIFICATE OF SERVICE

I certify that I have served today a copy of Respondent's Petition for Rehearing on counsel for the Appellant by hand delivery at the address as follows:

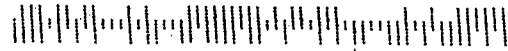
Authur K. Aiken, Esq.  
AIKEN & HIGHTOWER, P.A.  
2231 Devine Street, Suite 201  
Columbia, South Carolina 29205

  
Leland B. Greeley  
128 East Main Street, Suite 102  
Post Office Box 2981  
Rock Hill, South Carolina 29732  
(803) 329-0088 S.C. Bar # 7850  
Attorney for Respondent D & J  
Enterprises, Inc.

August 3, 2016



Leland Greeley  
P. O. Box 2981 (m  
128 E. Main St., S  
Rock Hill, SC 29732



**RECEIVED**

AUG 05 2016

SC Court of Appeals

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