

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas

Michael G. Nettles, Circuit Judge

Appellate Court Case No. 2015-002618

RECEIVED

AUG 17 2016

SC Court of Appeals

Patricia Doller.....Respondent,

v.

Lohr Plumbing, Inc.....Appellant.

**MOTION FOR EXTENSION OF TIME TO SERVE & FILE INITIAL BRIEF
DESIGNATION OF MATTER**

Pursuant to Rule 263(b), SCACR, Appellant, Lohr Plumbing, Inc., respectfully moves this Court for an order granting a thirty (30) day extension of time to file Appellant's Initial Brief and Designation of Matter. This is Lohr Plumbing, Inc.'s first request for extension of time to file the Appellant's Initial Brief and Designation of Matter. Appellant's Initial Brief and Designation of Matter are currently due on August 31, 2016. If granted, the extension would require the Appellant to file and serve its Initial Brief and Designation of Matter by September 30, 2016. The extension is necessitated due to the current case load and other conflicting deadlines of the undersigned counsel for the Appellant. Such conflicts prevent the undersigned counsel from adequately preparing, compiling, and serving the Appellant's Initial Brief and

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Designation of Matter by August 31, 2016. Lohr Plumbing, Inc. asks that the current deadline be held in abeyance pending the Court's resolution of this motion. This motion is not made for the purpose of undue delay, and opposing counsel has consented to the same.

Respectfully Submitted,

TUPPER, GRIMSLEY & DEAN, P.A.

By: 

Stacey P. Canaday (S.C. Bar No. 68805)
Ralph E. Tupper (S.C. Bar No. 5647)
Attorneys for Appellant Lohr Plumbing, Inc.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Judge

Circuit Court Case No. 2012-CP-07-4139

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SC Court of Appeals

Patricia Doller.....Respondent,

v.

Lohr Plumbing, Inc.....Appellant.

PROOF OF SERVICE

I certify that on August 17, 2016, I served a copy of the within and foregoing Appellant Lohr Plumbing Inc.'s Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter upon all parties via U.S. mail and electronic mail to counsel of record as set forth below:

Attorneys for Respondent Patricia Doller:

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(Signature page to follow)

Respectfully submitted,

TUPPER, GRIMSLEY & DEAN, P.A.

By: 

Stacey P. Canaday (S.C. Bar No. 68805)

Ralph E. Tupper (S.C. Bar No. 5647)

Attorneys for Appellant Lohr Plumbing,
Inc.

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August 17, 2016

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* ALSO ADMITTED IN NEW YORK

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SC Court of Appeals

FAX COVER SHEET

August 17, 2016

To: The Honorable Jenny Abbot Kitchings – (803) 734-1839

From: Stacey P. Canaday

RE: Patricia Doller v Lohr Plumbing, Inc.
Appellate Case No.: 2015-002618
Date of Case: 08-31-15
Our File No.: 22013

Number of Pages: 6, including cover sheet

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* ALSO ADMITTED IN NEW YORK

August 17, 2016

VIA U.S. MAIL AND FACSIMILE

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Patricia Doller v. Lohr Plumbing, Inc.
Appellate Case No. 2015-002618
TGD File No.: 22013

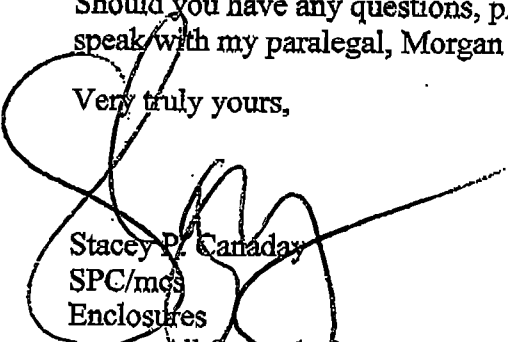
Dear Ms. Kitchings:

Please find enclosed the originals and six (6) copies each of *Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter* and *Proof of Service* on behalf of Appellant Lohr Plumbing, Inc. with regard to the above captioned matter. I would appreciate it if you would file the originals and six (6) copies of each and return the clocked copies to my office in the self-addressed, stamped envelope provided for your convenience. Also enclosed is this firm's check in the amount of \$25.00 for payment of filing fee.

By copy of this correspondence, together with its enclosures, I am hereby serving a copy of the aforementioned pleading on opposing counsel.

Should you have any questions, please feel free to contact me. If I am unavailable, please ask to speak with my paralegal, Morgan Shinaberry.

Very truly yours,


Stacey P. Canaday
SPC/mcs
Enclosures

cc: All Counsel of Record (via U.S. Mail and email w/encls)
Mr. Joe Stubbs, Auto Owners Insurance Company, Claim No. 72-4827-2011 (via email only)