

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2016-001525
Trial Case No. 2014-CP-39-350

Alliance Biomedical Research, LLC,

Appellant,

v.

Judith H. Parham, Personal Representative
of the Estate of David Michael Parham,
deceased and Parham & Smith, LLC,

Respondents.

RECEIVED

OCT 03 2016

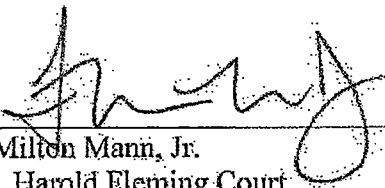
SC Court of Appeals

CONSENT MOTION FOR EXTENSION

Pursuant to South Carolina Appellate Rule 263(b), Appellant, with the consent of the Respondents, respectfully moves this Court to extend the time within which Appellant may file its Initial Brief by an additional four (4) days. Appellant's Initial Brief is currently due on October 3, 2016. The granting of this Consent Motion for Extension would cause Appellant's Initial Brief to be due by October 7, 2016. Appellant requests this extension due to the unexpected death of our eighteen (18) year old niece in Florida on September 17, 2016, in a car crash. This would be Appellant's third extension. By consent, Appellant requested and received a prior extensions of thirty (30) days and fourteen (14) days.

Prior to filing this motion, counsel for Appellant conferred with counsel for the

Respondents who graciously consented to the extension. This extension would not affect any other deadlines.



F. Milton Mann, Jr.
151 Harold Fleming Court
Spartanburg, South Carolina 29303
(864) 680-5079
Attorney for Appellant

October 3, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2016-001525
Trial Case No. 2014-CP-39-350

Alliance Biomedical Research, LLC,

Appellant,

v.

Judith H. Parham, Personal Representative
of the Estate of David Michael Parham,
deceased and Parham & Smith, LLC,

Respondents.

RECEIVED

OCT 03 2016

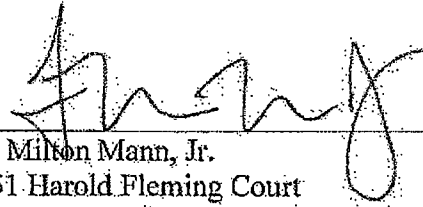
SC Court of Appeals

PROOF OF SERVICE

I certify that I have served Appellant's Consent Motion for Extension upon Respondents Judith H. Parham, Personal Representative of the Estate of David Michael Parham, deceased and Parham & Smith, LLC by email and depositing copies in the United States Mail, postage pre-paid; South Carolina Court of Appeals Clerk of Court, The Honorable Jenny Abbott Kitchings; by facsimile and depositing copies in the United States Mail, postage pre-paid, on October 3, 2016, at the addresses listed below:

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

Jeffrey M. Bogdan, Esquire
Barnwell Whaley Patterson & Helms, LLC
P.O. Drawer H
Charleston, SC 29402
Phone: (843) 577-7700
Attorney for Respondents



F. Milton Mann, Jr.
151 Harold Fleming Court
Spartanburg, South Carolina 29303
(864) 680-5079
Attorney for Appellant

October 3, 2016

F. MILTON MANN, JR
1089 BOILING SPRINGS RD
SPARTANBURG, SC 29303

1474

67-776/532 9987
1010253471530

10/3/16

Date

Pay to the Order of SC Court of Appeals, Clerk of Court \$ 25.00
Twenty five & 00/100 Dollars

Security Features: Date & Lock

© 2016 WELLS FARGO BANK, N.A.



Wells Fargo Bank, N.A.
South Carolina
wellsfargo.com

For ABR Extension

[Handwritten Signature]

ATP



FAX COVER SHEET

| | |
|-----------|--|
| TO | Jenny Abbott Kitchings, Clerk of Court |
| COMPANY | SC Appellate Court |
| FAXNUMBER | 18037341839 |
| FROM | holly mann |
| DATE | 2016-10-03 15:36:28 GMT |
| RE | ABR v. Parham - Case No. 2016-001525 |

COVER MESSAGE

Good Morning

Plasesee attached.

RECEIVED

OCT 03 2016

SC Court of Appeals

F. MILTON MANN, JR.

ATTORNEY AT LAW
LICENSED IN SC, GA & FL

RECEIVED

OCT 03 2016

October 3, 2016

SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29202

BY FACSIMILE AND U.S. MAIL

Re: Alliance Biomedical Research, LLC, Appellant,
v. Judith H. Parham, Personal Representative of the Estate of
David Michael Parham, deceased and Parham & Smith, LLC
Respondents – Appellate Case No. 2016-001525

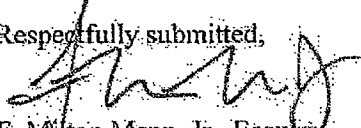
Dear Ms. Kitchings:

Please find enclosed, an original and seven (7) copies each of Appellant's Motion for Extension and Proof of Service. Please file the original in your records and return the FILE COPY to Appellant in the self-addressed, stamped envelope provided herewith. Additionally, enclosed is a check in the amount of Twenty-Five and 00/100 (\$25.00) Dollars for the filing fee.

We respectfully request this extension for the extraordinary circumstance that our eighteen (18) year old niece was killed in a car crash on September 17, 2016, in Florida. My Law Clerk, Holly Mann, is my former wife and this was her sister's only child. She was out the entire week of September 19th and I drove to Florida at the end of the week for the funeral. Brandy was just thirteen (13) days older than our son, Brad. Our entire family was very close with her.

Thank you in advance for your assistance in this matter.

Respectfully submitted,


F. Milton Mann, Jr., Esquire
Attorney for Appellant
SC Bar #68250

cc: Jeffrey Michael Bogdan (by email and U.S. Mail)
151 HAROLD FLEMING COURT * SPARTANBURG, SOUTH CAROLINA 29303
864-208-0359 * FAX 864-208-0233 * CELL 864-680-5079
EMAIL: MILTON.MANN@GMAIL.COM