

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity Judge

Case No. 2008- CP-40-03076

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OCT 13 2016
SC Court of Appeals

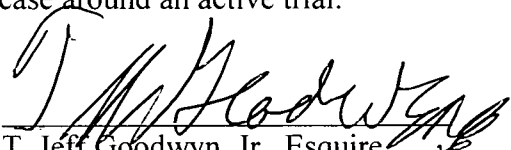
Tiffany's Café & Bakery on Devine, Inc.....Respondent,

v.

James S. Archer.....Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Respondent hereby moves for an additional thirty (30) days in which to file its Initial Brief that is currently due October 17, 2016. This motion is based on the relative complexity of the issues on appeal that are involved in this case around an active trial.


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Attorney for Appellant

October 12, 2016

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity Judge

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Tiffany's Café & Bakery on Devine, Inc.....Respondent,

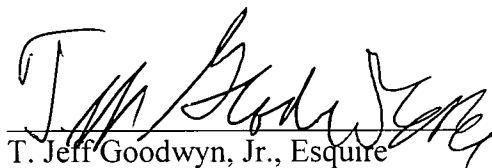
v.

James S. Archer.....Appellant.

PROOF OF SERVICE

I certify that I have served the **Appellant's Motion for Extension of Time to File Initial Brief** on Carlos W. Gibbons, Jr., Esquire, Counsel for the Respondent at the address below by depositing a copy of same in the United States Mail, postage prepaid, on October 12, 2016.

Carlos W. Gibbons, Jr., Esquire
Ashley & Gibbons, P.A.
712 Calhoun Street, Suite B
Columbia, SC 29201



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Attorney for Appellant

October 12, 2016

GOODWYN LAW FIRM, LLC

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Christopher J. Archer

Special Counsel:
Rachel G. Peavy

Of Counsel:
E. Crosby Lewis

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October 12, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 292111

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SC Court of Appeals

RE: *Tiffany's Café and Bakery on Devine, Inc. vs. James S. Archer*
Appellant Case No.: 2016-001514
Our File No.: 3000-0271

Dear Ms. Kitchings:

Our firm represents the Appellant, James S. Archer, in regard to the above-referenced appeal. This letter is to request a thirty (30) day extension to file and serve Appellant's Initial Brief and Designation of Matter. By my calculations, the requested extension would give us until November 16, 2016 to file and serve our initial brief and designation. No previous extension has been requested.

Enclosed is our firm's check in the amount of \$25.00 for the required filing fee.

By copy of this letter, I am notifying counsel for the Respondent of my request for a thirty (30) day extension. Thank you for your assistance with this matter.

Sincerely,



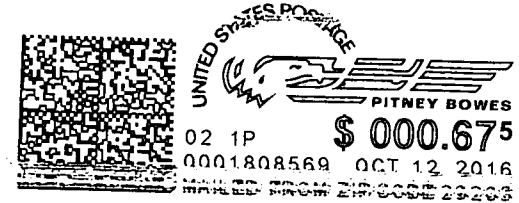
T. Jeff Goodwyn, Jr.

TJG/msb
Enclosure

cc: Carlos W. Gibbons, Jr., Esquire

✓

Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, S.C. 29205



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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
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