

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

FROM THE COURT OF COMMON PLEAS FOR RICHLAND COUNTY

Appellate Case No. 2016-002040
Civil Action No. 2015-CP-40-3502

RECEIVED

OCT 25 2016

SC Court of Appeals

Peter G. Oliver, Plaintiff,

v.

The University of South Carolina, Martin Goodman, and Nancy Williamson, Defendants.

**MOTION BY DEFENDANT MARTIN GOODMAN FOR AN EXTENSION OF TIME
TO FILE HIS REPLY TO THE PLAINTIFF'S RETURN TO HIS
MOTION TO SUPPRESS AUDIO RECORDING PURSUANT TO
SOUTH CAROLINA CODE ANN. § 17-30-110**

For the reasons stated below, Defendant Martin Goodman ["Goodman"], by and through his undersigned counsel, respectfully moves the Court for an extension of the deadline by which he may file his Reply to the Plaintiff's Return to his Motion to Suppress Audio Recording pursuant to South Carolina Code Ann. § 17-30-110.

Goodman filed and served his Motion to Suppress on September 30, 2016. By an order it issued October 17, 2016, this Court granted the Plaintiff's motion for an extension of time by which he could file and serve his Return to Goodman's Motion to Suppress, and, by doing so, this Court extended the deadline for the Plaintiff's Return until October 20, 2016.

In accordance with the Court's October 17, 2016 order, the Plaintiff filed and served his Return on October 20, 2016. Under the provisions of South Carolina Appellate Court Rule ["SCACR"] 240(f), Goodman's must file and serve his Reply to the Plaintiff's return no later



than today, October 25, 2016. However, Goodman's undersigned counsel now respectfully moves this Court for an extension of the deadline by which Goodman must file and serve his Reply from October 25, 2016 to Monday, October 31, 2016.

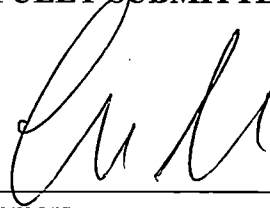
Goodman's undersigned counsel so moves in light of the reality that he traveled out of state on a long-planned personal trip on Thursday, October 20, 2016 and he did not return until Sunday, October 24, 2016.

Goodman's undersigned counsel also so moves in light of the reality that the Plaintiff's Return totals 33 pages, and it includes a total of four (4) exhibits, the first of which is an audio recording over 40 minutes long. Goodman's undersigned counsel, therefore, needs additional time to consult with Goodman so that Goodman's undersigned counsel may prepare a Reply which addresses the key arguments and assertions offered by the Plaintiff in his Return.

Goodman's undersigned counsel consulted with the Plaintiff's counsel via e-mail on October 24, 2016 concerning the instant motion, and the Plaintiff's counsel graciously consented to the proposed extension.

For these reasons, Goodman's undersigned counsel respectfully urges this Court to grant his instant motion, and, accordingly, Goodman's undersigned counsel respectfully urges this Court to extend the deadline by which Goodman may file and serve his Reply until Monday, October 31, 2016.

RESPECTFULLY SUBMITTED:



October 25, 2016

Lake E. Summers

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PROOF OF SERVICE

I certify that I have served **the MOTION BY DEFENDANT MARTIN GOODMAN FOR AN EXTENSION OF TIME TO FILE HIS REPLY TO THE PLAINTIFF'S RETURN TO HIS MOTION TO SUPPRESS AUDIO RECORDING PURSUANT TO SOUTH CAROLINA CODE ANN. § 17-30-110** on the above-named Plaintiff by mailing a copy to his counsel, first class postage pre-paid, at the following address:

Ryan K. Hicks, Esquire
J. LEWIS CROMER & ASSOCIATES, LLC
1418 Laurel Street – Suite A
Columbia, South Carolina 29201

October 25, 2016



LAKE E. SUMMERS