

81411

THE STATE OF SOUTH CAROLINA  
In the Court of Appeal

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Roger M. Young, Sr., Circuit Judge

**RECEIVED**  
OCT 28 2016  
SC Court of Appeals

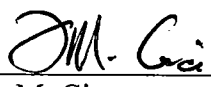
Appellate Case No: 2016-001170

William B. Haskin, Jr.....Appellant  
Samuel W. Rhodes, Jr., Rhodes Investments, Inc, Rhodes Consulting, LLC  
and Tracey M. Bozzelli.....Respondents

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND RECORD ON  
APPEAL

The Respondents, Samuel W. Rhodes, Jr., Rhodes Investments, Inc., Rhodes Consulting, LLC and Tracey M. Bozzeli hereby petition the Court for a thirty (30) day extension of time in which to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. Based on Respondents' calculations, the initial brief is due on or about October 29, 2016. With a thirty (30) day extension, the Initial Brief and Designation of Matter to be Included in the Record on Appeal will be due on or about November 28, 2016.

Counsel for the Appellant has no objection to this request.

  
Frank M. Cisa  
858 Lowcountry Blvd., Suite 101  
Mt. Pleasant, SC 29464  
(843) 881-6530 fax:(843) 881-5433  
E-mail: [frank@cisadodds.com](mailto:frank@cisadodds.com)  
Attorney for Appellant

This 26<sup>th</sup> day of October, 2016

Other Counsel of Record:

Richard S. Rosen, Esquire  
John E. Rosen, Esquire  
151 Meeting Street, Suite 400  
PO Box 893  
Charleston, SC 29402

Other Counsel of Record:

Richard S. Rosen, Esquire  
John E. Rosen, Esquire  
151 Meeting Street, Suite 400  
PO Box 893  
Charleston, SC 29402

THE STATE OF SOUTH CAROLINA  
In the Court of Appeal

**RECEIVED**

OCT 28 2016

SC Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Roger M. Young, Sr., Circuit Judge

---

Appellate Case No: 2016-001170

---

William B. Haskin, Jr.....Appellant

Samuel W. Rhodes, Jr., Rhodes Investments, Inc, Rhodes Consulting, LLC  
and Tracey M. Bozzelli.....Respondents

---

PROOF OF SERVICE

---

I certify that I have served a copy of the Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter, by United States Mail, postage prepaid, on October 26, 2016 I, addressed to the Appellate's attorneys, John E. Rosen and Richard S. Rosen with the law firm of Rosen, Rosen & Hagood, located at PO Box 893, Charleston, SC 29402.

Cisa & Dodds, LLP



---

Frank M. Cisa  
858 Lowcountry Blvd., Suite 101  
Mt. Pleasant, SC 29464  
(843) 881-6530  
fax:(843) 881-5433  
E-mail: [frank@cisadodds.com](mailto:frank@cisadodds.com)  
Attorney for Respondents

October 26<sup>th</sup>, 2016

**CISA & DODDS, LLP**  
**ATTORNEYS AND COUNSELORS AT LAW**  
858 Lowcountry Boulevard, Suite 101  
Mt. Pleasant, South Carolina 29464  
Telephone (843) 881-6530 Fax (843) 881-5433

**FRANK M. CISA**  
**JOHN J. DODDS, III**  
**ROBERT S. DODDS**

frank@cisadodds.com  
john@cisadodds.com  
robert@cisadodds.com

October 26, 2016

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

**RECEIVED**

OCT 28 2016

SC Court of Appeals

RE: Willam B. Haskin, Jr. v. Samuel W. Rhodes, Jr., et.al  
Appellate No.: 2016-001170  
Our file: 13-113

Dear Ms. Kitchings:

Enclosed is the original and seven (7) copies of the Respondents' Motion for Extension of Time to File Initial Brief and Record on Appeal together with my Proof of Service and my firm check payable to the Clerk's office in the amount of \$25.00. I would appreciate you filing the original and returning one (1) filed copy to me in the self-addressed stamped envelope provided.

With kindest regards, I am

Very truly yours,

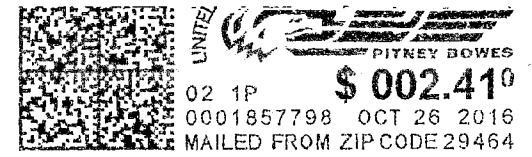


Frank M. Cisa

FMC/alp

Enclosures

cc: John E. Rosen, Esquire (w/enc.)  
Richard S. Rosen, Esquire (w/enc.)



**CISA & DODDS, LLP**  
ATTORNEYS AND COUNSELORS AT LAW  
858 LOWCOUNTRY BOULEVARD, SUITE 101  
MT. PLEASANT, SOUTH CAROLINA 29464

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

**RECEIVED**

OCT 28 2016

SC Court of Appeals

