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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Appellate Case No. 2016 – 001266

J. C. Nicholson, Jr., Circuit Court Judge

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DEC 12 2016
SC Court of Appeals

Case No. 2013-CP-10-1396

PERSONAL CARE, INC.Appellant,

vs.

JERRY N. THEOS; URICCHIO, HOWE, KRELL,
JOHNSON, TOPOREK THEOS & KEITH, PA;
CHERYL D. SHOUN; AND TAYLOR SHOUN,
BOWLEY & BYRD, LLC..... Respondents.

RESPONDENTS' JOINT MOTION FOR 30-DAY EXTENSION OF TIME TO FILE
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL

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Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, Respondents respectfully request that the Court provide them with a 30-day extension until January 30th for Respondents to file Respondents' Initial Brief and Designation of Matter to be Included in Record on Appeal. The basis for the motion is as follows. Given the holiday season, Respondents require additional time in order to coordinate among counsel to prepare a Respondents' Initial Brief and Designation of Matter to be Included in Record on Appeal.

Respectfully submitted,

<p>Barnwell Whaley Patterson & Helms, LLC By: <u>Phillip Ferderigos</u> jht M. Dawes Cooke, Jr. Phillip S. Ferderigos 288 Meeting Street, Suite 200 Charleston, SC 29401 <i>Attorneys for Jerry N. Theos and Uricchio, Howe, Krell, Jacobson, Toporek, Theos & Keith, P.A.</i></p>	<p>K&L Gates, LLP By: <u>Richard Farrier</u> jht Richard A. Farrier, Jr. 134 Meeting Street, Suite 500 Charleston, SC 29401 <i>Attorney for Cheryl D. Shoun</i></p>	<p>By: <u>Oana Johnson</u> jht Oana D. Johnson Attorney at Law 215 East Bay Street Suite 406 Charleston, SC 29401 <i>Attorney for Taylor Bowley and Byrd, LLC</i></p>
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Date: 12.8.16 Date: 12.8.16 Date: 12.8.16

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JOHNSON, TOPOREK THEOS & KEITH, PA;
CHERYL D. SHOUN; AND TAYLOR SHOUN,
BOWLEY & BYRD, LLC..... Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 2016, I served a copy of the foregoing Respondents' Joint Motion For 30-Day Extension Of Time To File Respondents' Initial Brief and Designation of Matter to be Included in Record on Appeal on counsel for the Appellant via U.S. Mail with sufficient postage, correctly addressed as follows:

PENDARVIS LAW OFFICES, P.C.
Thomas A. Pendarvis, Esq.
Christopher W. Lempesis, Esq.
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Beaufort, SC 29902-4188

K&L GATES LLP

By: *Richard Farrier*
Richard A. Farrier, Jr. *RF*

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December 8, 2016

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court
Court of Appeals for the State of South Carolina
PO Box 11629
Columbia, SC 29211

Re: **Personal Care, Inc., Appellant v. Jerry N. Theos; Uricchio, Howe, Krell, Johnson, Toporek Theos & Keith, PA; Cheryl D. Shoun; and Taylor, Shoun, Bowley & Byrd, LLC, Respondents**

Appellate Case No. 2016-001266

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven copies of Respondents' Joint Motion for 30-Day Extension of Time to File Respondents' Initial Brief and Designation of Matter to be Included in Record on Appeal and Certificate of Service in regard to the above-referenced matter. Also enclosed is our firm check in the amount of \$25.00 representing the filing fee.

Please file the original and six copies of the Joint Return and Proof of Service. Please return the clocked copy to me in the stamped, self-addressed return envelope enclosed for your convenience.

Thank you for your assistance with this matter.

Very truly yours,

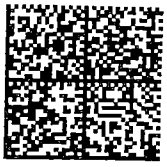
Richard Farrier /jft

Richard A. Farrier

RAF/kbt

Enclosures

cc w/ encls.: Thomas A. Pendarvis, Esq.
Christopher W. Lempesis, Jr., Esq.
Phillip S. Ferderigos, Esq.
M. Dawes Cooke, Jr., Esq.
George J. Kefalos, Esq.
Oana D. Johnson, Esq.



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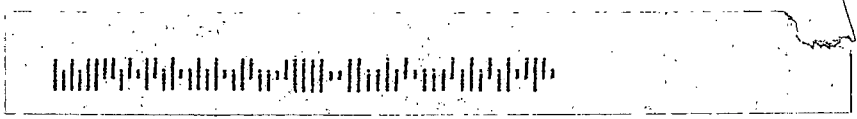
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SC Court of Appeals

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Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
P. O. Box 11629
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