

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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DEC 28 2016

**SC Court of Appeals**

APPEAL FROM THE ADMINISTRATIVE  
LAW COURT

Shirley C. Robinson, Administrative Law Judge

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Appellate Case No. 2016-002063

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South Carolina Department of .....Appellant,  
Consumer Affairs

v.

A Bargain Center, LLC ..... Respondent.

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

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Respondent A Bargain Center, LLC, moves pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure for a thirty (30) day extension to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-captioned matter. This motion is made on the grounds that due to the Holidays and an unusually busy workload, counsel for Respondent needs additional time to prepare and file the Initial Brief and Designation of Matter. Counsel therefore requests additional time to prepare these pleadings in this matter.

This is the first request for an extension and is not intended for purposes of delay. Further, this request is not intended to prejudice the opposing party by an extension of time.

By the undersigned's calculations, the extension, if granted, would extend Appellant's deadline for filing its Initial Brief and Designation of Matter to February 3, 2017.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of the Initial Brief and Designation of Matter to be Included in the Record on Appeal to February 3, 2017.



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S. Jahue Moore, Esquire  
MOORE TAYLOR LAW FIRM, P.A.  
P.O. Box 5709  
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(803) 796-9160  
ATTORNEY FOR THE RESPONDENT

West Columbia, South Carolina  
December 28, 2016

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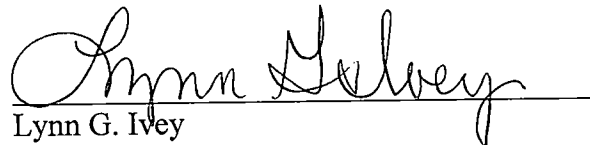
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**PROOF OF SERVICE**

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I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., hereby certify that I served a copy of the Motion for Extension of Time to File Initial Brief and Designation of Matter on the following person(s) by placing a copy of the same in the United States Mail, in an envelope with sufficient postage affixed thereto, addressed as follows:

Christine E. Thompson, Esquire  
Staff Attorney  
South Carolina Department of Consumer Affairs  
P.O. Box 5757  
Columbia, SC 29250

  
Lynn G. Ivey

West Columbia, South Carolina  
December 28, 2016

S. Jahue Moore<sup>†</sup>  
J. Mark Taylor\*  
C. Vance Stricklin, Jr.  
James Edward Bradley<sup>†</sup>  
Sheila McNair Robinson  
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S. Jahue Moore, Jr.  
John C. Bradley, Jr.  
Melissa K. Moore  
William B. Fortino  
Ralph Nichols Riley, Jr.  
Amber Cary Fulmer  
Sarah Taylor Cassidy  
-----  
Robert D. Hazel  
OF COUNSEL  
Billy C. Coleman  
RETIRED

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**SC Court of Appeals**

December 28, 2016

The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

RE: South Carolina Department of Consumer Affairs v. The Bargain  
Center, LLC  
Appellate Case No. 2016-002063

Dear Ms. Kitchings:

I trust this letter finds you well. Enclosed please find for filing the original and five copies of Appellant's Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal. I am also enclosing our firm check in the amount of \$25.00 and Proof of Service on opposing counsel.

Please file the original and return the clocked copies in the enclosed self-addressed, stamped envelope. By my calculations, the Motion, if granted, will extend the time to file until February 3, 2017.

Thank you in advance for your assistance in this matter.

Respectfully,

  
S. Jahue Moore

JCB:lgi

Enclosures

cc: Sean M. Bolchoz, Esquire

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