

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

Appellate Case No. 2016-001514

RECEIVED

FEB 13 2017

SC Court of Appeals

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

v.

James S. Archer.....Appellant.

APPELLANT'S MOTION FOR EXTENSION

Appellant hereby moves for an extension of ten (10) days from the date of this motion in which to file his Reply Brief. The grounds for this motion are as follows:

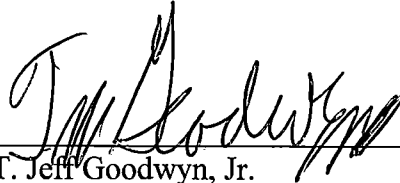
1. Respondent filed its Initial Brief on January 25, 2017.
2. Although a Proof of Service is attached to the Initial Brief of Respondent, indicating that its brief was mailed to the undersigned on January 24, 2017, Appellant has not yet received a copy of Respondent's brief.
3. The undersigned sent correspondence to Respondent's counsel on February 7, 2017 requesting a copy of Respondent's Initial Brief.
4. The undersigned copied this Court with the above correspondence.

5. On February 13, 2017, this Court informed the undersigned that Respondent had filed an Initial Brief and the undersigned has now obtained a copy of this brief from this Court's online records.

For the reasons stated above, Appellant respectfully moves this Court for a ten (10) day extension, making his reply brief due on February 23, 2017

Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.

Goodwyn Law Firm, LLC

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Attorney for Appellant

Columbia, South Carolina
February 13, 2017

Other Counsel of Record:

Adam T. Silvernail, Esquire
PO Box 7995
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Counsel for Respondent

Carlos W. Gibbons, Jr., Esquire
712 Calhoun St., Ste. B
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Counsel for Respondent

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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FEB 13 2017

SC Court of Appeals

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

v.

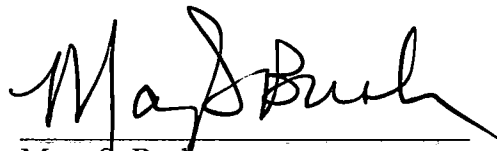
James S. Archer.....Appellant.

PROOF OF SERVICE

I certify that I have served the **Appellant's Motion for Extension** on Adam T. Silvernail, Esquire and 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 February 13, 2017.

Carlos W. Gibbons, Jr., Esquire
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Adam T. Silvernail, Esquire
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February 13, 2017

GOODWYN LAW FIRM, LLC

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Christopher J. Archer

Special Counsel:
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Of Counsel:
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February 13, 2017

VIA HAND DELIVERY

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

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FEB 13 2017

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

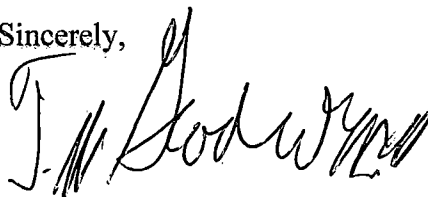
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of Appellant's Motion for Extension in regard to the above-referenced matter.

By copy of this letter, I am serving a copy of the Motion upon Carlos W. Gibbons, Jr., Esquire, and Adam T. Silvernail, Esquire, attorneys for the Respondent.

Thank you for your assistance with this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Carlos W. Gibbons, Jr., Esquire
Adam T. Silvernail, Esquire

J