

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

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FEB 23 2017

SC Court of Appeals

Appellate Case No.: 2016-001612
Civil Case No.: 2014-CP-40-4234


Luis Endara,.....Appellant,
v.
AVSX Technologies, LLC;
Bobby Johnson; and
Mary Kay Johnson,.....Respondents.

REQUEST FOR EXTENSION

COMES NOW Appellant, Luis Endara, by and through undersigned counsel, and respectfully moves this Honorable Court pursuant to SCACR Rule 263(b) for a thirty-day extension of the filing date of the Initial Brief of Appellant, making the due date of Appellant's initial brief March 27, 2017. Appellant would show unto this Court, that due to the great issues presented in the four (4) day trial and the designation of evidence and matters to be included in the record on appeal, equity and justice are best served by granting Appellant the prayed for extension to more thoroughly narrow the issues on appeal.

(Signature follows on the next page.)





Michael W. Sautter, Esquire
Michael H. Ellis, Esquire
Query Sautter & Associates, LLC
The Wappoo Centre
147 Wappoo Creek Drive, Suite 202
Charleston, South Carolina 29412
(843) 795-9500

Counsel for Appellant

February 20, 2017
Charleston, SC

Other Counsel of Record:

Todd Ellis, Esquire
Law Office of Todd Ellis, PA
7911 Broad River Road, Suite 100
Irmo, South Carolina, 29063
(803) 732-0123

Counsel for Respondents

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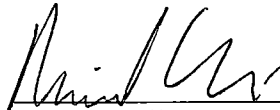
**AFFIDAVIT OF MICHAEL ELLIS
IN SUPPORT OF APPELLANT'S
REQUEST FOR EXTENSION**

THE AFFIANT, after being duly sworn, attests as follows:

1. My name is Michael Ellis, I am at least 18 years of age, and I have personal knowledge of the following.
2. I am counsel of record for the appellant.
3. It is my belief that due to the great issues presented in the four (4) day trial and the designation of evidence and matters to be included in the record on appeal, equity and


justice are best served by granting Appellant the prayed for extension to more thoroughly narrow the issues on appeal.

FURTHER AFFIANT SAYETH NOT!



Michael Ellis

Sworn to and Subscribed before
me this 20th day of February, 2017



Notary Public of South Carolina
My Commission Expires: 5/22/2019

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PROOF OF SERVICE

I certify that I have served appellant's request for extension to file his initial appellant brief on respondents by depositing a copy of it in the United States Mail, postage prepaid, on February 20, 2017, addressed to his attorneys of record at their offices as follows:

Todd Ellis, Esquire
Law Office of Todd Ellis, PA
7911 Broad River Road, Suite 100
Irmo, South Carolina, 29063



Michael W. Sautter, Esquire
Michael H. Ellis, Esquire
Query Sautter & Associates, LLC
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Counsel for Appellant

February 20, 2017
Charleston, SC

Other Counsel of Record:

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Counsel for Respondents

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ATTORNEYS AND COUNSELORS AT LAW

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O. Grady Query*

*Certified Circuit Court Arbitrator and Mediator

*Certified National Trial Advocacy Civil Trial Specialist

Michael W. Sautter**

**Managing Partner

Elizabeth "Brooke" Hurt

Michael H. Ellis, Jr.

Grant A. Williamson

February 20, 2017

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SC Court of Appeals

Via U.S. Mail

Jenny Abbott Kitchings

South Carolina Court of Appeals Clerk of Court

Post Office Box 11629

Columbia, South Carolina 29211

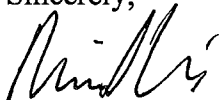
RE: Luis Endara v. AVSX Technologies, LLC; Bobby Johnson; and Mary Kay
Johnson
Appellate Case No.: 2016-001612
Civil Action No.: 2014-CP-40-4234

Dear Ms. Kitchings:

Please find enclosed with this correspondence, one original and seven copies of Appellant's Request for Extension, an Affidavit of Michael Ellis in Support of Appellant's Request for Extension, a Proof of Service. Also enclosed is twenty-five dollars (\$25.00.) cash for the filing fee. Please file the original and return one of the copies to me in the self enclosed envelope.

Thank you for your assistance. Should you have any questions, please do not hesitate to contact this office.

Sincerely,



Michael Ellis

cc: Todd Ellis, Esquire

QUERY SAUTTER & ASSOCIATES, LLC
147 WAPPOO CREEK DR STE 202
CHARLESTON, SC 29412

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