

STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2015-002648

RECEIVED

MAR 13 2017

SC Court of Appeals

ABC Amusements, Inc., and Scott Wiener Respondents,

vs.

Michael O. Howard, High-Lite Rides, Inc., and MGR Rides, LLC Appellants.

**MOTION FOR EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE THE REPLY BRIEF OF RESPONDENT**

Appellants (“Michael O. Howard, High-Lite Rides, Inc., and MGR Rides, LLC”),
through its undersigned counsel, would respectfully show unto this Court as follows:

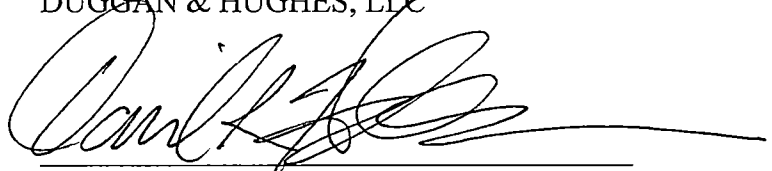
The Reply Brief of Appellants is due to be served and filed no later than March 13, 2017.
However, due to counsel’s workload, counsel requests an extension of time in which to serve and
file the Reply Brief of Appellants.

Appellants’ request for an extension is not intended for purposes of delay.

WHEREFORE, Appellants pray that this Court grant their Motion for Extension of Time
within which to serve and file the Reply Brief of Appellant for an additional fifteen (15) days
from March 13, 2017; and, for such other relief as this Court may deem just and proper.

Respectfully submitted,

DUGGAN & HUGHES, LLC

A handwritten signature in black ink, appearing to read "Daniel R. Hughes", with a long horizontal line extending to the right.

Daniel R. Hughes, Esquire SC Bar # 72547
457-B Pennsylvania Ave. (29650)
P.O. Box 449 (*Mailing*)
Greer, South Carolina 29652-0449
Telephone: (864) 334-2501
Fax: (864) 879-0149

March 10, 2017

ATTORNEYS FOR MICHAEL O. HOWARD,
HIGH-LITE RIDES, INC., AND MGR RIDES,
LLC

STATE OF SOUTH CAROLINA
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PROOF OF SERVICE

I certify that I served the Motion for Extension of Time within Which to Serve and File the Reply Brief of Appellants upon ABC Amusements, Inc. and Scott Wiener, by way of their attorney, by depositing a copy of same in the United States mail, postage prepaid, addressed as follows:

Wendell Hawkins, Esquire
103-C Regency Commons Drive
Greer, SC 29650


Susan E. Guest, Paralegal
DUGGAN & HUGHES, LLC
Post Office Box 449
Greer, SC 29652-0449
Direct: 864-334-2500
Fax: 864-879-0149

March 10, 2017

DUGGAN & HUGHES, LLC
ATTORNEYS AND COUNSELORS AT LAW

John B. Duggan
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Evan C. Bramhall

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Mailing Address
Post Office Box 449
Greer, S.C. 29652

March 10, 2017

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MAR 13 2017

SC Court of Appeals

VIA FEDERAL EXPRESS/OVERNIGHT

The South Carolina Court of Appeals
Attn: Clerk of Court
Post Office Box 11629
Columbia, SC 29211

Re: ABC Amusements, Inc., and Scott Wiener v. Michael O. Howard, High-Lite
Rides, Inc., and MGR Rides, LLC [Appeal]
Appellate Case No.: 2015-002648

Dear Clerk:

Enclosed please find the original and one copy of the Motion for Extension of Time within Which to Serve and File the Reply Brief of Appellant, along with Proof of Service for same in regard to the above-referenced matter. I am also enclosing this firm's check made payable to you in the amount of \$25.00 to cover your cost for filing. Please return our clocked copy in the self-addressed prepaid envelope provided.

Furthermore, by copy of this letter I am serving same upon opposing counsel.

Sincerely,

DUGGAN & HUGHES, LLC

Susan E. Guest

Susan E. Guest

Paralegal

sguest@dugganhughes.com

Direct: 864-334-2500

Enclosures

Cc w/encl:
Wendell Hawkins, Esquire
103-C Regency Commons Drive
Greer, SC 29650

J

1 From

Date 3-10-2017 Sender's FedEx Account Number 2109-4743-4

Sender's Name Daniel R. Hughes, Esq Phone 564 534-2500

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Address 457-B Pennsylvania Ave. Dept./Floor/Suite/Room

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2 Your Internal Billing Reference

3 To

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Company SC Court of Appeals

Recipient's Address 1220 Senate Street Dept./Floor/Suite/Room

Address Columbia State SC ZIP 29201

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SC Court of Appeals

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1 FedEx Priority Overnight Next business morning.** 5 FedEx Standard Overnight Next business afternoon.* 6 FedEx First Overnight Earliest next business morning delivery to select locations.*

3 FedEx 2Day Second business day.* 20 FedEx Express Saver Third business day.*

FedEx Envelope rate not available. Minimum charge: One-pound rate.

4b Express Freight Service To add SATURDAY Delivery, see Section 6. **Packages over 150 lbs.** ** To most locations

7 FedEx 1Day Freight* Next business day.** 8 FedEx 2Day Freight Second business day.** 83 FedEx 3Day Freight Third business day.**

* Call for Confirmation: _____

5 Packaging *Declared value limit \$500

6 FedEx Envelope* 2 FedEx Pak* Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak. 3 FedEx Box 4 FedEx Tube 1 Other

6 Special Handling Include FedEx address in Section 3.

3 SATURDAY Delivery Available ONLY for FedEx Priority Overnight, FedEx 2Day, FedEx 1Day Freight, and FedEx 2Day Freight to select ZIP codes. 1 HOLD Weekday at FedEx Location Not available for FedEx First Overnight. 31 HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods? One box must be checked.

No 4 Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required. 6 Dry Ice Dry ice, 9 UN 1845 _____ x _____ kg. Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

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FedEx Acct. No. _____ Exp. Date _____
Credit Card No. _____

Total Packages _____ Total Weight 102 Total Charges _____
Credit Card Auth. _____

8 NEW Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

No Signature Required Package may be left without obtaining a signature for delivery. 10 Direct Signature Anyone at recipient's address may sign for delivery. Fee applies. 34 Indirect Signature If no one is available at recipient's address, anyone at a neighboring address may sign for delivery. Fee applies.

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