

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

APR 06 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 April 4, 2017 in which to serve the record on appeal and file a proof of service of same. The grounds for this motion are as follows:

1. Appellant filed and served its Initial Brief on November 16, 2016.
2. Respondent filed its Initial Brief on January 25, 2017.
3. Appellant filed and served its Reply Brief on February 23, 2017.
4. Although a Proof of Service is attached to Respondent's Designation of

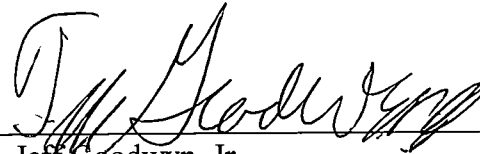
Matter to be Included in the Record on Appeal, indicating that it was mailed to the undersigned on January 24, 2017, Appellant has not yet been served with a copy of this document.

5. Due in part to the above, Appellant inadvertently calendared the wrong due date for serving the record on appeal and filing a proof of service of same.

For the reasons stated above, Appellant respectfully moves this Court for a ten (10) day extension, requiring the record on appeal be served and the proof of service of same be filed no later than April 14, 2017

Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, SC 29205
JGoodwyn@Goodwynlaw.com
(803) 251-4517
(803) 251-4527
Attorney for Appellant

Columbia, South Carolina
April 5, 2017

Other Counsel of Record:

Adam T. Silvernail, Esquire
PO Box 7995
Columbia, SC 29202
Counsel for Respondent

Carlos W. Gibbons, Jr., Esquire
712 Calhoun St., Ste. B
Columbia, SC 29201
Counsel for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

APR 06 2017

SC Court of Appeals

Joseph M. Strickland, Master-in-Equity Judge

Case No.: 2008-CP-40-03076

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 April 5, 2017.

Carlos W. Gibbons, Jr., Esquire
Ashley & Gibbons, P.A.
712 Calhoun Street, Suite B
Columbia, SC 29201

Adam T. Silvernail, Esquire
Law Offices of Adam T. Silvernail
P.O. Box 7995
Columbia, SC 29202



Mary S. Bush
Paralegal to T. Jeff Goodwyn, Jr., Esquire
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, South Carolina 29205
(803) 251-4517

April 5, 2017

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
Christopher J. Archer

Special Counsel:
Rachel G. Peavy

Of Counsel:
E. Crosby Lewis

*Also Licensed in Georgia

Reply to:
2519 Devine Street
Suite A
Columbia, South Carolina 29205

111-B Congress Street
Winnsboro, South Carolina 29180

Tel. (803) 251-4517 (Columbia)
Fax (803) 251-4527

Tel. (803) 635-1920 (Winnsboro)
Fax (803) 635-2100

Email: Contact@Goodwynlaw.com
Web: www.GoodwynLaw.com

April 5, 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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APR 06 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

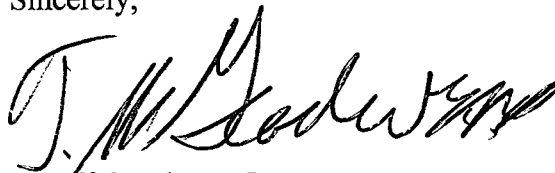
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of Appellant's Motion for Extension along with a check in the amount of \$25.00 for the filing fee 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

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