

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

APR 27 2017

SC Court of Appeals

D. Craig Brown, Circuit Court Judge

Case No. 2014-CP-40-4234

Luis Endara Appellant,

v.


AVSX Technologies, LLC,
Bobby Johnson, and Mary Kay Johnson Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, respondents request a 30-day extension of the deadline for filing their initial brief and designation of matter to be included in the record on appeal. This is the first request for an extension of this deadline.

Respectfully submitted,

April 27, 2017



Blake A. Hewitt, # 73674
John S. Nichols, # 4210
BLUESTEIN NICHOLS
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Attorneys for Respondents



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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant with a copy of the *Notice of Appearance* and *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Michael W. Sautter
Michael Holland Ellis, Jr.
Query Sautter & Associates, LLC
147 Wappoo Creek Dr., Ste. 202
Charleston, SC 29412

April 27, 2017


Erin Bridges



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

April 27, 2017

VIA HAND DELIVERY

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

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SC Court of Appeals

Re: Luis Endara v. AVSX Technologies, LLC
Case Tracking No. 2016-001612

Dear Ms. Kitchings:

Attorneys Blake Hewitt and John Nichols have been retained to assist as counsel for the Respondents in this case. Please find enclosed the original and one (1) copy of a request to notice their appearance. Also, please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have enclosed a proof of service of these documents on counsel for the Appellant and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Todd R. Ellis, Esquire
Michael W. Sautter, Esquire
Michael H. Ellis, Jr., Esquire