

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

Honorable R. Keith Kelly, Circuit Court Judge

Case No. 2014-CP-04-1426 *consolidated with* Case No. 2015-CP-04-2206

Appellate Case No. 2017-000267

Carla Denise Garrison and Clint Garrison.....Appellants/Cross Respondents,

v.

Target Corporation.....Respondent/Cross Appellant.

**MOTION FOR EXTENSION OF TIME
FOR THE GARRISONS TO FILE A RESPONDENT'S BRIEF
TO TARGET'S INITIAL CROSS APPEAL BRIEF**

The Garrisons have filed their initial brief related to their appeal. Because Target filed a cross-appeal, the Garrisons must also file a respondent brief, which is currently due on May 11, 2017. The Garrisons respectfully request a 30 day extension of time to file their respondent brief. Counsel for the Garrisons have obligations in other cases that will impede completion of the respondent brief by May 11, 2017. If granted, the Garrisons' respondent brief will be due on June 12, 2017.

Dated: May 2, 2017.

Respectfully submitted,

THE J.T. HAWKINS LAW FIRM, LLC

BY: 

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(Admitted Pro Hac Vice)

**COUNSEL FOR
APPELLANTS/CROSS
RESPONDENTS**

CERTIFICATE OF SERVICE

I, Joshua T. Hawkins, certify that I filed this motion with the Clerk of the Court and sent a copy to the following by Certified Mail:

Mr. Knox L. Haynsworth, III
Brown, Massey, LLC
106 Williams Street
Greenville, South Carolina 29601

Messrs. Powell, Sibley, and Elliker
Hunton and Williams, LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219

ATTORNEYS FOR RESPONDENT/CROSS APPELLANT

The Honorable Alan Wilson
P.O. Box 11549
Columbia, South Carolina 29211

SOUTH CAROLINA ATTORNEY GENERAL
Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, South Carolina 29201

THIS, the 2nd day of May, 2017.

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JOSHUA T. HAWKINS

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SC Court of Appeals

May 2, 2017

✓ Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box-11629
Columbia, South Carolina 29211

Ms. Rosalyn W. Frierson, Director
South Carolina Court Administration
Calhoun Building
1220-Senate Street, Suite 200
Columbia, South Carolina 29201-3739

Re: *Carla Denise Garrison and Clint Garrison, Appellants v. Target Corporation, Respondent*
Appellate Case No.: 2017-000267
Trial Court Case No.: 2014-CP-04-01426 *consolidated with* 2105-CP-04-02206

Dear Madams:

Please find enclosed the Garrisons' Motion for Extension of Time in the appellate case referenced above, together with a Certificate of Service and the \$25.00 filing fee (included in the mailing to the Clerk of Court).

If you have questions or concerns, please do not hesitate to contact our office.

Sincerely,



David Schroeder, PhD
Legal Assistant to Joshua T. Hawkins

Enclosures



The J.T. Hawkins Law Firm, LLC
1225 South Church Street
Greenville, South Carolina 29605

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SC Court of Appeals

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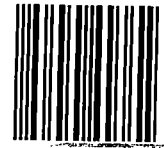
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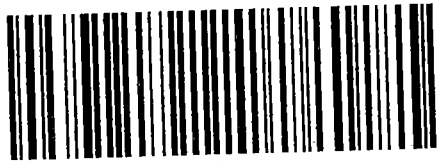
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Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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Columbia, South Carolina 29211

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