

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas  
R. Keith Kelly, Circuit Court Judge

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MAY 09 2017

SC Court of Appeals

Appellate Case No. 2017-000267

CARLA DENISE GARRISON AND CLINT GARRISON,  
*Appellant-Respondents,*

v.

TARGET CORPORATION,  
*Respondent-Appellant.*

**TARGET'S MOTION FOR AN EXTENSION OF TIME TO FILE ITS BRIEF  
IN RESPONSE TO THE INITIAL BRIEF OF APPELLANT- RESPONDENTS**

Pursuant to Rule 263, SCRAR, Respondent-Appellant Target Corporation respectfully requests a thirty-day extension to file its brief in response to the opening brief of Appellant-Respondents Carla Denise Garrison and Clint Garrison. Target has conferred with the Garrisons regarding this request, and they do not oppose it.

This case involves the Garrisons' appeal and Target's cross-appeal from the judgment of the trial court. Target was served with the Garrisons' opening brief on April 11, 2017, making Target's responsive brief due by May 11, 2017. The Garrisons' opening brief raises novel questions regarding the constitutionality and application of South Carolina's statutory cap on punitive damages, among other issues. Counsel for Target has been diligently preparing its responsive brief. Nonetheless, an extension of time would allow Target additional time to properly frame and address the issues raised by the Garrisons in their opening brief.

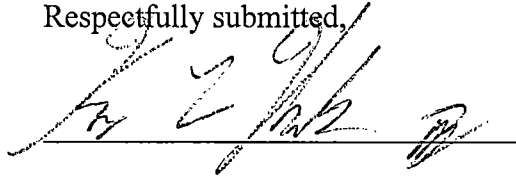
Moreover, on May 2, 2017, the Garrisons filed their own motion for a thirty-day extension of time to file their brief in response to Target's opening brief. Target does not oppose such an extension of time, so long as a like extension is granted for Target. A thirty-day extension of time for both parties to file their responsive briefs will support a strong presentation of the issues in this matter and will ensure fairness to both sides in those efforts.

Under Rule 263 of the South Carolina Appellate Court Rules, "[t]he time prescribed by [the] Rules for performing any act except the time for serving the notice of appeal ... may be extended or shortened by the appellate court, or by any judge or justice thereof." Rule 263, SCACR. Target respectfully requests that the Court grant a thirty-day extension, making Target's responsive brief due by Monday, June 12, 2017.

Dated May 9, 2017

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Respectfully submitted,



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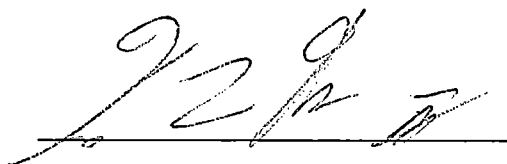
*Counsel for Respondent-Appellant*

**PROOF OF SERVICE**

I hereby certify that I served Respondent-Appellant Target's Motion for an Extension of Time to File Its Brief in Response to the Initial Brief of Appellant-Respondents by having the same delivered to their counsel of record, Joshua T. Hawkins, at 1225 South Church Street, Greenville, South Carolina 29601, on May 9, 2017. I also served the Motion for An Extension of Time by sending a copy via United States Mail on May 9, 2017, to their counsel of record, G. Todd Butler, at P.O. Box 16114, Jackson, Mississippi, 29236.

Dated May 9, 2017

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*Counsel for Respondent-Appellant*

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OF COUNSEL  
C. Vincent Brown

May 9, 2017

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

Re: *Carla Denise Garrison and Clint Garrison vs. Target Corporation*  
Appellate Case No.: 2017-000267

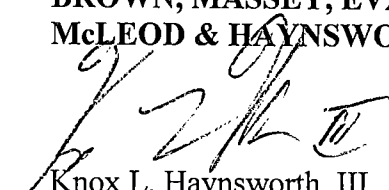
Dear Ms. Kitchings:

Enclosed please find the original and six copies of Respondent-Appellate Target Corporation's Motion for Extension of Time to File its Brief in Response to the Initial Brief of Appellant-Respondents in the above matter, as well as a check in the amount of \$25.00 representing the filing fee. I would be most appreciative if you would file the original and six copies and clock an extra copy for our files. By copy of this letter and as evidenced by the enclosed certificate of service, we have served a copy of our motion on counsel for Appellate-Respondents.

With best regards, I remain

Sincerely,

**BROWN, MASSEY, EVANS,  
McLEOD & HAYNSWORTH, LLC**

  
Knox L. Haynsworth, III

KLH/lab  
Enclosure

cc: Lewis F. Powell, III, Esquire  
George P. Sibley, III, Esquire  
Kevin S. Elliker, Esquire  
Joshua T. Hawkins, Esquire  
G. Todd Butler, Esquire

J