

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Phillip Lenski, Administrative Law Judge

Case No. 2017-000968

RECEIVED

MAY 11 2017

SC Court of Appeals

Richard Beltram, Appellant,

v.

South Carolina Department of Revenue, Respondent.

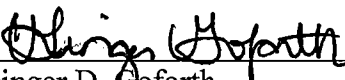
MOTION TO EXTEND TIME TO FILE RETURN TO MOTION TO DISMISS

Appellant Richard Beltram submits this motion pursuant to Rule 240, SCACR requesting an extension of ten (10) days within which to file a return to Respondent South Carolina Department of Revenue's Motion to Dismiss. While the date of service of the motion was April 28, 2017, Appellant's counsel was out of town on business during the week of May 1, 2017, and did not receive the mailing until she returned to the office. The ten day period for filing a return extended through today, May 8, 2017. Under the circumstances, including the complexity of the

issues raised by Respondent, Appellant requests an additional ten day period within which to respond, making his filing due on or before May 18, 2017.

Appellant respectfully requests that the Court hold all time limits in abeyance while considering this motion. Appellant further submits that this request is not made solely for the purpose of delay, and will not prejudice any parties hereto.

THE WARD LAW FIRM, P.A.
Attorneys for Appellant



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May 8, 2017

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Appellant Richard Beltram's Motion to Extend Time to File Return to Motion to Dismiss was served upon all parties of record on May 8, 2017 by depositing copies of the same via process service and/or United States mail, postage affixed, to the following address:

South Carolina Department of Revenue
Nicole M. Wooten
Timothy C. Thompson
Milton G. Kimpson

Office of General Counsel for Litigation
South Carolina Department of Revenue
300A Outlet Pointe Boulevard
P.O. Box 12265
Columbia, SC 29211


Ginger D. Groforth

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♦ CERTIFIED MEDIATOR
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SC Court of Appeals


The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
PO Box 11629
Columbia, SC 29211

**RE: Richard Beltram v. South Carolina Department of Revenue
Appellate Case No. 2017-000968**

Dear Ms. Kitchings:

Enclosed please find one (1) original and seven (7) copies of Appellant Richard Beltram's Motion to Extend Time to file Return to Motion to Dismiss along with the filing fee of \$25.00. Also please find a Certificate of Service enclosed herewith. Please file the originals and return the clocked copy to me in the postage-paid, self-addressed envelope provided.

Sincerely,



Ginger D. Goforth

GDG/prm
Enclosure

cc: South Carolina Department of Revenue
Nicole M. Wooten
Timothy C. Thompson
Milton G. Kimpson

✓



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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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