

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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JUN 05 2017

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
In The Court of Common Pleas

Honorable Marvin H. Dukes, III, Circuit Court Judge

Appellate Case No. 2017-000242

Trial Court Case No. 2015-CP-07-01251

Robert E. Feldman and Louis J. Feldman ..... Appellants,

v.

Gary P. Coggin ..... Respondent.

RESPONDENT'S MOTION TO EXTEND  
PAGE LIMIT FOR REPLY BRIEF

M. Dawes Cooke, Jr.  
Jeffrey M. Bogdan  
Barnwell Whaley Patterson & Helms, LLC  
P. O. Drawer H  
Charleston, SC 29402  
(843) 577-7700  
Attorneys for Respondent

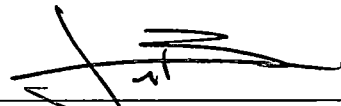
Dated: June 2, 2017  
Charleston, South Carolina

Other Counsel of Record  
Thomas A. Pendarvis  
Christopher W. Lempesis, Jr.  
Pendarvis Law Offices, P.C.  
710 Boundary St., Unit A-1  
Beaufort, SC 29902-4188  
843.524.9500  
Attorneys for Appellants



Pursuant to Rule 208(b)(5) of the South Carolina Appellate Court Rules, Respondent Gary Coggin respectfully moves this Court for leave to exceed the twenty-five (25) page limit allowed for his reply brief. Appellants Initial Brief is thirty-five (35) pages long, and Respondent cannot fully respond to all arguments made therein within the twenty-five-page limitation. Respondent believes his brief will be no longer than thirty (30) pages. Respondent has notified counsel for Appellants of this motion and, while counsel for Appellants indicated they cannot consent to the motion, they also will not object to it.

WHEREFORE, Respondent respectfully requests leave for his reply brief to exceed the twenty-five page limit for its reply brief.



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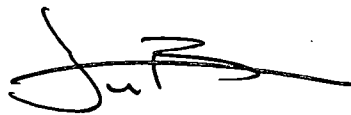
Gary P. Coggin ..... Respondent.

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PROOF OF SERVICE

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I certify that I have served the Respondent's Motion to Extend Page Limit for Reply Brief on Appellants Robert E. Feldman and Louis J. Feldman by depositing a copy of it in the United States Mail, postage prepaid, on June 2, 2017, addressed to its counsel of record Thomas Pendarvis and Christopher W. Lempeis, Jr., Esquire at address 710 Boundary Street, Unit A1, Beaufort, SC 29902-4188.



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Charleston, SC 29402  
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Attorneys for Respondent

Dated: June 2, 2017  
Charleston, South Carolina

**BARNWELL  
WHALEY**

PATTERSON & HELMS LLC

**75**  
YEARS ■ 1938-2013

Attorneys for businesses & professionals since 1938

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June 2, 2017

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Robert E. Feldman, et al v. Gary P. Coggin  
Appellate Case No. 2017-000242  
BWPH# 5059.001

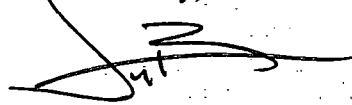
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Respondent's Motion to Extend Page Limit for Reply Brief along with a check for Twenty-Five Dollars (\$25.00) for the filing fee. Upon filing the original, please return one (1) clocked copy to me in the envelope enclosed for your convenience. Please do not hesitate to contact me with any questions or concerns.

By copy of this correspondence, I am serving a copy of the Motion upon counsel of record.

With kind regards,

Yours truly,



Jeffrey M. Bogdan

JMB/jgc  
Enclosures

cc: Thomas A. Pendarvis (w/enclosure)  
Christopher W. Lempeis, Jr., Esquire (w/enclosure)

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE



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P.O. Drawer H, Charleston, SC 29402-0197

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**SC Court of Appeals**

5059.001  
The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

