

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

Case No. 2014-CP-40-4234

RECEIVED
JUN 26 2017
SC Court of Appeals

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. The current deadline is June 26, 2017. This is the third request for an extension of this deadline.

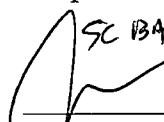
The following facts are offered as extraordinary circumstances supporting this request: The lawyer with chief responsibility for drafting this brief is involved in a matter in Spartanburg County in which trial began this morning. Due to additional recent obligations, such as an oral argument before this Court, participating in the Supreme Court Institute earlier this month, and additional briefing obligations, Counsel has been unable to complete the brief within the current deadline.

This will be the final requested extension of this deadline.



June 26, 2017

Respectfully submitted,

 SC BAR 77907
for Blake Hewitt

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 *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



Erin Bridges

June 26, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

June 26, 2017

VIA HAND DELIVERY

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

RECEIVED

JUN 26 2017

SC Court of Appeals

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

Dear Ms. Kitchings:

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 copy 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