

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
J.C. Nicholson, Jr., Circuit Court Judge

RECEIVED

NOV 14 2012

SC Court of Appeals

Case No. 2009-CP-10-06529

Amber Johnson.....Respondent,

v.

Stanley E. Alexander, Mario S. Inglese
and Mario S. Inglese, P.C., Of Whom
Stanley E. Alexander is the.....Appellant,

Mario S. Inglese and Mario S. Inglese, P.C.Third Party Plaintiffs,

v.

Charles Feeley.....Third Party Defendant.

APPELLANT’S MOTION FOR EXTENSION TO FILE INITIAL REPLY BRIEF

Appellant Stanley E. Alexander (“Alexander”) hereby moves for an order for an additional ten (10) days to file his Initial Reply Brief. Respondent’s Initial Brief is dated November 5, 2012, however, Alexander received this brief in the United States Mail on November 8, 2012. Alexander understands his Initial Reply Brief is due on or before November 15, 2012. Based on the number of issues on appeal and legal arguments raised, along with deadlines pending in other matters, Alexander respectfully requests an additional ten (10) days, until November 25, 2012 to submit an Initial Reply Brief or otherwise respond.

11/15

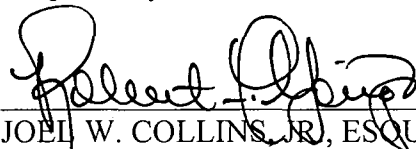
~~11/25~~

~~11/20~~

12/12

This is Alexander's first request for an extension. Counsel for Respondent does not object to the relief requested herein.

Respectfully submitted,

By: 
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ATTORNEYS FOR APPELLANT
STANLEY E. ALEXANDER

Columbia, South Carolina
November 12, 2012

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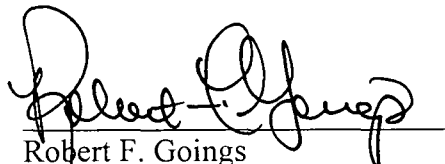
Charles Feeley.....Third Party Defendant.

PROOF OF SERVICE

I certify that I have served Appellant's Motion For Extension To File Initial Reply Brief by mailing a copy of same, via United States Mail, on November 12, 2012 to the following:

Mary Leigh Arnold
Mary Leigh Arnold, P.A.
749 Johnnie Dodds Blvd., Suite B
Mount Pleasant, SC 29464
Attorney for Respondent

Justin Kahn, Esquire
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Robert F. Goings
Counsel for Appellant



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November 12, 2012

VIA UNITED STATES MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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SC Court of Appeals

Re: Amber Johnson v. Stanley Alexander
Case No.: 2009-CP-10-06529
Court of Appeals Case No.: 2011196007

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Appellant's Motion for Extension to File Initial Brief and Designation of Matter along with Proof of Service and a check for \$25.00 representing payment for the applicable filing fee. Please file the original and return the filed-stamped copy to me in the enclosed envelope.

By copy of this letter I am serving these documents on all counsel. Thank you for your assistance and please feel free to contact me should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Goings", is written over the typed name. The signature is fluid and cursive, with a large initial "R".

Robert F. Goings

cc: Stanley Alexander, Esq.
Joel W. Collins, Esq.
Justin S. Kahn, Esq.
Mary L. Arnold, Esq.