

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Case No. 2016-CP-23-03431

Phyllis B. Thomas,

Appellant,

v.

Barbara R. Merline, Diane P. Meacham,
MHA's LLC, TAXLAW, LLC, David A.
Merline, Jr., Keith G. Meacham, and
Merline & Meacham, P.A.

Respondents.

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SC Court of Appeals

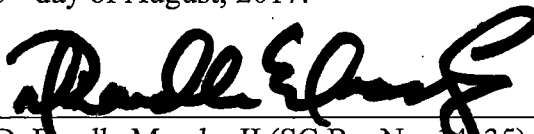
APPELLANT'S MOTION FOR EXTENSION OF TIME

Comes Now, Appellant Phyllis Thomas and files this motion for extension of time to file the initial brief and designation of matter to be included in the record on appeal. The Notice of Appeal in this case was filed on July 28, 2017. The lower court denied a motion for reconsideration on July 21, 2017. Appellant ordered the transcript in this proceeding during the pendency of the motion for reconsideration. Therefore, the transcript was received early in the appeal—on or following August 4, 2017. The computation of thirty days from this time period for the initial brief would make the initial brief due on Sunday, September 3, 2017, and by rule would roll to Monday September 4, 2017, which is Labor Day. Accordingly, initial briefs and designation of matter to



be included in the record on appeal may be presently due on Tuesday, September 5, 2017. Appellant respectfully requests a thirty-day extension of time until October 3, 2017, to submit the initial brief and designation of matter to be included in the record on appeal. This is the first motion for extension and Appellant notes that due to the early receipt of the transcript, the October 3, 2017, date might normally fall within the 60-day period that the court reporter has to complete the transcript. Accordingly, Appellant respectfully requests that the filing date for the initial brief and designation of matter to be included in the record on appeal be extended to Tuesday, October 3, 2017.

Respectfully submitted this 23rd day of August, 2017.



D. Randle Moody, II (SC Bar No. 14135)
JACKSON LEWIS P.C.
15 South Main Street, Suite 700
Greenville, SC 29601
Phone: (864) 232-7000
Facsimile: (864) 235-1381
E-mail: randy.moody@jacksonlewis.com

**ATTORNEY FOR APPELLANT
PHYLLIS B. THOMAS**

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PROOF OF SERVICE

I certify that I have served a copy of Appellant's Motion For Extension Of Time by depositing a copy of it in the United States Mail, postage prepaid, on August 23, 2017, addressed to its attorney of record:

Thomas Stephenson, Esq.
Jeffrey P. Dunlaevy, Esq.
STEPHENSON & MURPHY, LLC
207 Whitsett Street
Greenville, SC 29601

Respectfully submitted,



D. Randle Moody, II (SC Bar No. 14135)
JACKSON LEWIS P.C.
15 South Main Street, Suite 700
Greenville, SC 29601

Phone: (864) 232-7000
Facsimile: (864) 235-1381
E-mail: randy.moody@jacksonlewis.com

**ATTORNEY FOR APPELLANT
PHYLLIS B. THOMAS**

August 23, 2017

4818-4853-2046, v. 1

Representing Management Exclusively in Workplace Law and Related Litigation

jackson lewis
Attorneys at Law

Jackson Lewis P.C.
15 South Main Street
Suite 700
Greenville SC 29601
Tel 864 232-7000
Fax 864 235-1381
www.jacksonlewis.com

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*through an affiliation with Jackson Lewis P.C., a Law Corporation

MY DIRECT DIAL IS: 864-672-8037
MY EMAIL ADDRESS IS: RANDY.MOODY@JACKSONLEWIS.COM

August 23, 2017

VIA U.S. MAIL

Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Phyllis B. Thomas v. Barbara R. Merline
Appellate Case No. 2017-001637


Dear Ms. Kitchings:

Enclosed for filing is Plaintiff's Motion For Extension Of Time and Proof of Service in the above matter, as well as a \$25 check for the filing fee. Please return a stamped copy to me, using the enclosed self-addressed, stamped envelope.

If you have any questions regarding this, please contact me at your convenience.

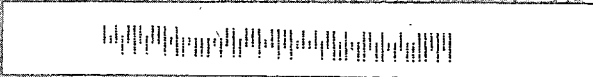
Sincerely,

JACKSON LEWIS P.C.


D. Randle Moody, II

DRM/msw

cc: Tom Stephenson
Jeff Dunlaevy



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jackson lewis Attorneys at Law **Jackson Lewis P.C.**
 15 South Main Street
 Suite 700
 Greenville, South Carolina 29601

Jenny Abbott Kitchings
 Clerk of Court
 The South Carolina Court of Appeals
 PO Box 11629
 Columbia SC 29211