

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BARNWELL COUNTY
Court of Common Pleas
Doyet A. Early, III, Circuit Court Judge

Case No. 2017-00068

Martha M. Fountain and Curtis Fountain.....Plaintiffs,

v.

Fred's, Inc., and Wildevco, LLC.....Respondents,

v.

Tippins-Polk Construction, Inc., and Rhoad's Excavating Services, LLC.....Third-Party
Defendants.

Of Whom Tippins-Polk Construction, Inc. is the Appellant.

**RESPONDENT, WILDEVCO, LLC'S MOTION TO
EXTEND TIME TO FILE AND SERVE INITIAL BRIEF**

Respondent, Wildevco, LLC hereby moves the Court to extend the time for the filing of its Initial Brief. The Respondent's Initial Brief is due to be served and filed on September 11, 2017. Respondent is in the process of preparing its brief but respectfully requests until October 11, 2017 to file its brief. The undersigned conferred with counsel for Appellant and for Respondent Fred's, Inc. prior to the filing of this motion and both parties consent to the request for extension of time.

(Signature page to follow)

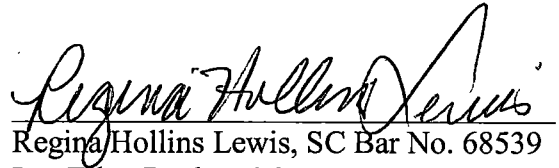
RECEIVED

SEP 01 2017

SC Court of Appeals



Respectfully submitted,



Regina Hollins Lewis, SC Bar No. 68539

Lee Ellen Bagley, SC Bar No. 77672

Gaffney Lewis & Edwards, LLC

3700 Forest Drive, Suite 400

Columbia, SC 29204

(803) 790-8838

Columbia, South Carolina
September 7, 2017

Attorneys for Respondent Wildevco, LLC

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BARNWELL COUNTY
Court of Common Pleas
Doyet A. Early, III, Circuit Court Judge

Case No. 2017-00068

Martha M. Fountain and Curtis Fountain.....Plaintiffs,

v.

Fred's, Inc., and Wildevco, LLC.....Respondents,

v.

Tippins-Polk Construction, Inc., and Rhoad's Excavating Services, LLC.....Third-Party
Defendants.

Of Whom Tippins-Polk Construction, Inc. is the Appellant.

RECEIVED

SEP 01 2017

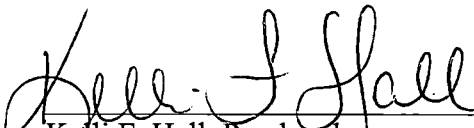
SC Court of Appeals

CERTIFICATE OF SERVICE

I do hereby certify, on this 1st day of September, 2017, that a copy of the foregoing
Respondents' Motion to Extend Time to File and Serve Respondents' Brief(s) was served by
depositing a copy of the same in the United States Mail, first-class, postage prepaid, addressed to
counsel of record as follows:

Morgan S. Templeton, Esquire
Peden Brown McLeod, Jr., Esquire
Wall Templeton & Haldrup, PA
PO Box 1200
Charleston, South Carolina 29402

Matthew C. LaFave, Esquire
Crowe LaFave, LLC
PO Box 1149
Columbia, South Carolina 29202


Kelli F. Hall, Paralegal

Columbia, South Carolina



3700 Forest Drive, Suite 400, Columbia, SC 29204 | T: 803.790.8838 | F: 803.790.8841
www.glelawfirm.com

September 1, 2017

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

Re: *Martha M. Foutain and Curtis Fountain v. Fred's Inc., and Wildevco, LLC v. Tippins-Polk Construction, Inc, and Rhoad's Excavating Services, LLC*
Case No : 2017-00068

Dear Clerk Kitchings:

Enclosed for filing please find the original and seven (7) copies of Respondent's Motion to Extend Time to File and Serve Initial Brief, along with a check in the amount of \$25.00 for the filing fee in the above-referenced matter. We would appreciate you filing the original with the Court and returning the clocked copy for our records to the courier.

By copy of this letter, I herewith serve all counsel of record with same. Should you have any questions or need additional information please do not hesitate to contact our office.

Sincerely,

A handwritten signature in cursive script that reads 'Kelli'.

Kelli F. Hall
Paralegal

RECEIVED
SEP 01 2017
SC Court of Appeals

/kfs

Enclosures

cc: Morgan S. Templeton, Esq.
Matthew C. LaFave, Esq.