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IN 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

**RECEIVED**  
SEP 12 2017  
**SC Court of Appeals**

Appellate 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' FRED'S, INC.'S MOTION FOR AN EXTENSION

Respondent, Fred's, Inc., hereby moves the Court for a thirty (30) day extension in which to file the Initial Brief of Respondents and Designation of Matter to be included in the Record on Appeal.

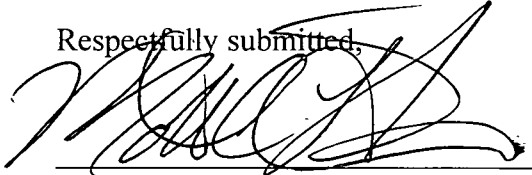
The Initial Brief of Respondent is currently due on September 10, 2017. This is Respondents' first request for an extension. The extension is being requested, while the Respondent has begun preparation of the brief, to permit sufficient time for its completion and to keep respective deadlines consistent as Respondent is aware of an extension requested and granted as to Respondent, Wildevco, LLC on its submissions to October 11, 2017. Counsel for

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Respondent has conferred with counsel for Appellant and Respondent, Wildevco, LLC and each have consented to the request for an extension of time.

September 7, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. LaFave', written over a horizontal line.

Matthew C. LaFave  
CROWE LAFAVE, LLC  
Post Office Box 1149  
Columbia, South Carolina 29202  
803.724.5727 (Phone)  
ATTORNEY FOR RESPONDENT, FRED'S, INC.

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Defendants.

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

PROOF OF SERVICE

I certify that I have served the Respondent Fred's, Inc.'s Motion for an Extension on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on September 7, 2017, addressed to its attorney of record, Morgan S. Templeton, Esquire, Post Office Box 1200, Charleston, South Carolina 29402.

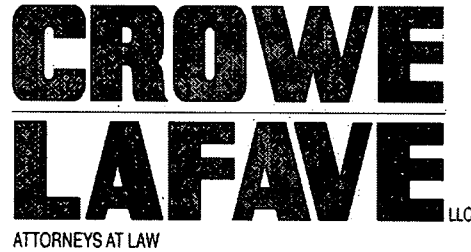
September 7, 2017

  
Denise M. Brockwell  
Paralegal

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September 7, 2017

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

Re: Martha M. Fountain v. Fred's, Inc., et al.  
Case No. 2017-00068

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SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of the Respondent Fred's, Inc.'s Motion for an Extension relative to the above-referenced matter. Also enclosed is a check in the amount of \$25.00 representing the filing fee. Once filing is complete, please return the clocked copy to us in the enclosed self-addressed, stamped envelope.

By copy of this correspondence to the attorneys of record, I am hereby notifying them of this filing. Should you have any questions or concerns, please do not hesitate to contact us.

Sincerely yours,

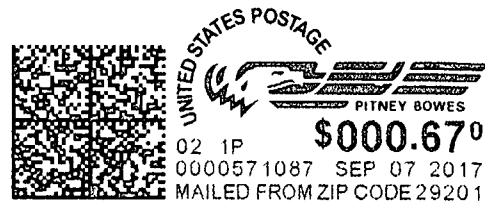
A handwritten signature in black ink that reads "Denise M. Brockwell".

Denise M. Brockwell  
Paralegal

/dmb  
Enclosure

cc: Morgan S. Templeton, Esquire  
Regina Hollins Lewis, Esquire

Crowe LaFave, LLC  
P.O. Box 1149  
Columbia, SC 29202



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