

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HAMPTON COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen, Circuit Court Judge

Case No. 2016-CP-25-00409
Appellate Case No. 2017-00158

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SEP 18 2017

SC Court of Appeals

Calvin Clark,	Respondent,
v.	
U.S. Money Shops of South Carolina, LLC and Claude M. Beacham, Jr. d/b/a Recovery, Inc. and Wrecker Service,	Defendants,
Of whom U.S. Money Shops of South Carolina, LLC is	Appellant.

Motion for an Extension of Time

U.S. Money Shops of South Carolina, LLC ("Appellant") respectfully requests a fifteen (15) day extension of time to file its Initial Brief and Designation of Matter in the above-captioned appeal. This motion is not made to delay this appeal. Rather, Appellant has sufficient grounds to warrant such a request.

First, Hurricane Irma required the Court reschedule an oral argument for undersigned counsel from September 13th to Wednesday, September 20th, which is the current deadline for Appellant's Initial Brief and Designation of Matter in this matter. The shift in that oral argument and the preparation time related to same directly conflicted with the current deadline and precluded counsel from drafting the brief in this matter. Second, the parties are engaged in good




faith and productive settlement talks that could render this appeal unnecessary. The extension would allow the parties to finalize that settlement. Either ground provides sufficient grounds to extend this deadline.

Currently, Appellant's Initial Brief and Designation of Matter are due on September 20, 2017. Appellants request a fifteen (15) day extension of time until October 5, 2017 based on the above grounds. Counsel for Respondent has consented to this request. Appellant will not seek further extension of this deadline.

Therefore, Appellant requests that this Court enter an order extending the deadline for the Initial Brief of Appellant and Designation of Matter until October 5, 2017. Appellant requests that the current deadline be held in abeyance while the Court considers this request.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: _____


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Attorneys for U.S. Money Shops of South Carolina, LLC

Columbia, South Carolina

September 18, 2017

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Calvin Clark, Respondent,

v.

U.S. Money Shops of South Carolina, LLC and Claude
M. Beacham, Jr. d/b/a Recovery, Inc. and Wrecker
Service, Defendants,

Of whom U.S. Money Shops of South Carolina, LLC is
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PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins
Riley & Scarborough LLP, attorneys for U.S. Money Shops of South Carolina, LLC, do hereby
certify that I have served all counsel in this action with copies of the pleading(s) hereinbelow
specified to the following address(es):


Pleadings: **Motion for an Extension of Time**

Counsel Served:

U.S. Mail
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Cindy K. Hess
Sr. Administrative Assistant

September 18, 2017



NELSON MULLINS

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September 18, 2017

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street (29201)
Post Office Box 11629
Columbia, SC 29211

RE: Calvin Clark v. U.S. Money Shops of South Carolina, LLC, et al.
Civil Action No. 2016-CP-25-00409
Appellate Case No. 2017-001158
Our File No. 53377/01500

Dear Ms. Kitchings:

Enclosed for filing in the above-reference matter please find the original and seven copies of a Motion for an Extension of Time, along with a check for the filing fee. Please return a clocked-in copy to us via our courier.

By copy of this letter, we are serving all counsel with this document.

Very truly yours,

Michael J. Anzelmo

MJA:ckh

cc: R. Alexander Murdaugh, Esquire
Neil E. Alger, Esquire
Mr. Claude M. Beacham, Jr.

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