

STATE OF SOUTH CAROLINA
In the Supreme Court

ON CERTIFICATION OF QUESTIONS FROM THE
UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
J. Michelle Childs, United States District Court Judge

Appellate Case No. 2017-001652

RECEIVED

OCT 10 2017

Beattie B. Ashmore, in his capacity as court-appointed
receiver for Ronnie Gene Wilson and Atlantic Bullion
and Coin, Inc.,Plaintiff,

S.C. SUPREME COURT

v.

Jim Dodds,Defendant,

PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO FILE BRIEF ON CERTIFIED QUESTIONS

Plaintiff Beattie B. Ashmore ("Plaintiff" or "Receiver"), in his capacity as court-appointed receiver for Ronnie Gene Wilson and Atlantic Bullion & Coin, Inc., hereby requests a two-week extension of time until October 25, 2017, to file and serve his Brief on Certified Questions, which Plaintiff understands to be presently due on October 11, 2017. Counsel has conferred with counsel for Defendant Jim Dodds ("Dodds"), who consents to the requested extension.

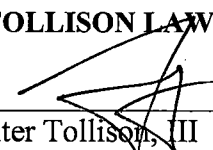
Plaintiff's counsel received the Court's Order agreeing to accept the U.S. District Court's certified questions on September 11, 2017, appearing to make the deadline October 11, 2017 per Rule 244(e), SCACR. However, the Court entered an Amended Order on September 13, 2017, received by the Receiver on September 18, 2017, raising the question of whether the amendment

amendment altered the original deadline. The requested extension will assist Plaintiff in confirming the deadline. Furthermore, Plaintiff submits that the additional requested time will permit him to more completely present the issues to the Court and that good cause exists for the extension.

WHEREFORE, and with the consent of Defendant, Plaintiff hereby respectfully requests that this Court extend Plaintiff's deadline to file and serve Plaintiff's Brief on Certified Questions to October 25, 2017.

Respectfully submitted,

THE TOLLISON LAW FIRM, P.A.



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Attorneys for the Receiver

October 9, 2017
Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

ON CERTIFICATION OF QUESTIONS FROM THE
UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
J. MICHELLE CHILDS, UNITED STATES DISTRICT COURT JUDGE

Appellate Case No. 2017-001652

Beattie B. Ashmore, in his capacity as court-
appointed for Ronnie Gene Wilson and
Atlantic Bullion and Coin, Inc.

Plaintiff,

v.

Jim Dodds

Defendant.

PROOF OF SERVICE

I certify that on October 9, 2017, I did cause Ms. Pam R. Osborne to serve the foregoing PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF ON CERTIFIED QUESTIONS, on all counsel of record by depositing the same in the U.S. Mail, postage prepaid, addressed to Bradford N. Martin, Esq. & Laura W. H. Teer, Esq., BRADFORD NEAL MARTIN & ASSOCIATES, P.A., Post Office Box 10410, Greenville, South Carolina, 29603.

October 9, 2017


THE TOLLISON LAW FIRM, P.A.

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OCT 10 2017

S.C. SUPREME COURT

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