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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge

Case No. 2015-CP-10-3919

**RECEIVED**  
DEC 01 2017  
SC Court of Appeals

Athan Fokas .....Respondent,

v.

Phillip Ferderigos, Spiros Ferderigos,  
and Jacob Ferderigos..... Defendants,

of Whom

Phillip Ferderigos is ..... Appellant.

**CONSENT MOTION FOR EXTENSION OF TIME TO SERVE INITIAL BRIEF AND DESIGNATION OF  
MATTER FOR INCLUSION IN RECORD ON APPEAL**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Phillip Ferderigos, with the written consent of counsel for the Respondent, respectfully moves this Court for a sixty (60) day extension of time to serve his initial brief and designation of matters for inclusion in record on appeal for the reasons and good cause set forth below:

1. Pursuant to Rule 208(a)(1) and Rule 209(a), SCACR, Appellant’s Initial Brief and Designation of Matters for Inclusion in the Record are due to be filed on or before December 4, 2017.
2. Appellant files this motion requesting a sixty (60) day extension to file his Initial Brief and Designation of Matters for Inclusion in the Record with the written consent of counsel for the Respondent.



3. Appellant has taken exception to numerous rulings from the lower court that resulted in the grant of summary judgment against the Appellant.

4. The issues involved in the appeal require extensive research and briefing.

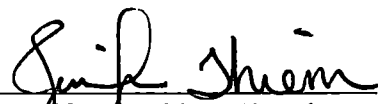
5. The Appellant needs an extension of time to properly prepare his Initial Brief and to determine the appropriate contents of the Record on Appeal.

6. Appellant has consulted with all counsel of record, and all counsel consent to Appellant's extension request.

7. Appellant believes the extension of time would provide Appellant until February 2, 2018, to serve and file his Initial Brief and Designation of Matters for Inclusion in the Record on Appeal.

Therefore, for the foregoing reasons and with the consent of counsel for the Respondent, the Appellant respectfully asks this Court to grant it a sixty (60) day extension of time to file his Initial Brief and Designation of Matters for Inclusion in the Record on Appeal.

Date: November 29, 2017



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Counsel for Appellant Phillip Ferderigos

Other counsel of Record:

Jeremy E. Bowers  
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**PROOF OF SERVICE**

I certify that on this 29th day of November 2017, I have served on all counsel of record a copy of the attached Motion for Extension of Time on behalf of Phillip Ferderigos by causing a copy of the same to be placed in the U.S. Mail, first-class postage paid, addressed to:

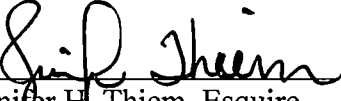
Stanley E. Barnett, Esquire  
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Attorney for Spiros Ferderigos

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Wills Massalon & Allen, LLC  
97 Broad Street  
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(843) 727-1144  
Attorney for Jacob Ferderigos

Date: November 29, 2017

  
\_\_\_\_\_  
Jennifer H. Thiem, Esquire  
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Charleston, SC 29413-2092

Counsel for Appellant Phillip Ferderigos

November 29, 2017

Jennifer H. Thiem  
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Jennifer.thiem@klgates.com

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

**Re: Phillip Ferderigos, Spiros Ferderigos, and Jacob Ferderigos, Defendants,  
Phillip Ferderigos, Appellant,  
Athan Fokas, Respondent  
C/A No. 2015-CP-10-3919**

Dear Ms. Kitchings:

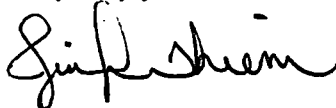
Enclosed herewith please find the original and seven (7) copies of the *Consent Motion for Extension of Time to Serve Initial Brief and Designation of Matter for Inclusion in Record on Appeal and Proof of Service* in the above-referenced matter. Please file the original and return one file-stamped copy to me in the enclosed, self-addressed, stamped envelope.

Also enclosed, please find this firm's check in the amount of \$25 for the required filing fee.

Thank you for your assistance with this matter. By copy of this letter, we are serving all counsel of record with same.

With kind regards, I remain

Very truly yours,



Jennifer H. Thiem

Enclosures

cc w/enc.: Stanley E. Barnett, Esquire  
Leslie S. Lenhardt, Esquire  
Jeremy E. Bowers, Esquire  
John A. Massalon, Esquire

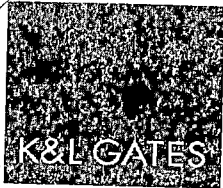
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# First Class Mail



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SUITE 500  
P.O. BOX 22092 (29402)  
CHARLESTON, SC 29401

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