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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Sr. Circuit Court Judge  
Kristi Lea Harrington, Circuit Court Judge

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RECEIVED  
DEC 14 2017  
SC Court of Appeals

Case No.: 2016-CP-08-334

Appellate Case No.: 2017-001563

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Cynthia Wright and Richard Wright, Appellants

v.

South Carolina Department of Transportation, Pilot Travel Centers, LLC,  
Speedway, LLC, Ashley Land Surveying, Inc., f/k/a Ashley Engineering &  
Consulting, Inc., and Munlake Contractors, Inc., Defendants,

Of whom South Carolina Department of Transportation, Pilot Travel Centers,  
LLC, Speedway, LLC, Ashley Land Surveying, Inc., f/k/a Ashley Engineering &  
Consulting, Inc., and Munlake Contractors, Inc. are the Respondents.

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**Motion for Extension of Time for All Respondents to File & Serve  
Initial Brief & Designation of Matter**

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Respondents, South Carolina Department of Transportation, Pilot Travel  
Centers, LLC, Speedway, LLC, and Ashley Land Surveying, Inc., f/k/a Ashley  
Engineering & Consulting, Inc., respectfully move this Court for an Order pursuant  
to Rule 263(b) SCACR for thirty (30) day extension of time in which to file and serve  
its Initial Brief and Designation of Matter to be Included in the Record on Appeal

which at present is due on December 29, 2018. This motion is not made for the purpose of undue delay, and is the first request for an extension of time.

We have attempted to consult with Counsel for Appellants but have not received a response. With the requested extension, Respondents South Carolina Department of Transportation, Pilot Travel Centers, LLC, Speedway, LLC, and Ashley Land Surveying, Inc., f/k/a Ashley Engineering & Consulting, Inc.'s Initial Brief and Designation of Matter would be due January 29, 2018.

MAYBANK LAW FIRM, LLC  
531 Savannah Highway  
Post Office Box 12579  
Charleston, SC 29422  
Phone: (843) 766-8101  
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E-mail: [roy@maybanklaw.com](mailto:roy@maybanklaw.com)



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Amanda R. Maybank  
Attorneys Defendant  
South Carolina Department of  
Transportation

Dated: 12-13-17

Charleston, South Carolina

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**PROOF OF SERVICE**

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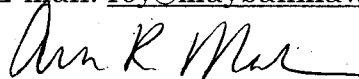
The undersigned hereby certifies that on December \_\_\_\_\_, 2017 a true and correct copy of *Motion for Extension of Time for All Respondents to File and Serve Initial Brief and Designation of Matter* was served and delivered by depositing a copy in the U.S. Mail, postage paid addressed to the following:

Kevin B. Smith, Esquire  
Hoffman Law Firm  
7087 Rivers Avenue  
North Charleston, SC 29406

S. Randall Hood, Esquire  
Jordan C. Calloway, Esquire  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732

Shawn B. Deery, Esquire  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201

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Amanda R. Maybank  
Attorneys Defendant South Carolina  
Department of Transportation

Dated: 12-13-17

Charleston, South Carolina

# MAYBANK LAW FIRM, LLC

ATTORNEYS AT LAW

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DEC 14 2017  
SC Court of Appeals

Roy P. Maybank  
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Facsimile: (843) 766-8103

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December 13, 2017

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Clerk of Court  
1015 Sumter Street  
Columbia, SC 29201

Re: Cynthia Wright and Richard Wright v. SCDOT, Pilot Travel Centers, LLC, Speedway, LLC, Ashley Land Surveying, Inc. f/k/a Ashley Engineering & Surveying, Inc., Ashley Engineering & Consulting, Inc. and Munlake Contractors, Inc.  
Case No.: 2016-CP-08-0334  
IRF Claim No.: 08874  
MLF File: 102.051

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies for Motions for Extension of Time for All Respondents to File & Serve Initial Brief and Designation of Matter and Proof of Service in regard to the above referenced matter. Also enclosed is our firm check in the amount of \$25.00 for the motion fee.

Please file the originals and six (6) copies of each motion and return one (1) filed copy of each motion for our file. A self-addressed, prepaid envelope is provided for this purpose.

Should you have any questions, please do not hesitate to call.

With kind regards, I am

Sincerely,

A handwritten signature in black ink, appearing to read 'Am RM', with a horizontal line extending from the end of the signature.

Amanda R. Maybank

ARM/tgw

Enclosures

cc: Kevin B. Smith, Esquire  
S. Randall Hood, Esquire  
Jordan C. Calloway, Esquire  
Shawn B. Deery, Esquire  
William G. Besley, Esquire  
Bennett Crites, Esquire  
Bruce A. Berlinsky, Esquire

00046

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MUR3

FedEx Express Package US Airbill

FedEx Tracking Number

8082 5132 3763

Form ID No.

0215

Recipient's Copy

15240

fedex.com 1800.GoFedEx 1800.463.3339

05545031

1 From [Redacted]  
 Date 12/13/17  
 Sender's Name Amanda Maybank Phone 843 766-8101  
 Company MAYBANK LAW FIRM, LLC  
 Address 531 SAVANNAH HWY  
 City CHARLESTON State SC ZIP 29407-7209

2 Your Internal Billing Reference 102.051

3 To Recipient's Name SC Court of Appeals  
 Company Clerk of Court  
 Address 1015 Sumner Street  
 City Columbia State SC ZIP 29201

HOLD Weekday  
 FedEx location address  
 REQUIRED. NOT available for  
 FedEx First Overnight.  
 HOLD Saturday  
 FedEx location address  
 REQUIRED. Available ONLY for  
 FedEx Priority Overnight and  
 FedEx 2Day to select locations.



8082 5132 3763

0119814145

4 Express Package Service \*To most locations.  
 NOTE: Service order has changed. Please select carefully.

Next Business Day  FedEx First Overnight  
 2 or 3 Business Days  FedEx 2Day A.M.  
 FedEx Priority Overnight  
 FedEx Standard Overnight

RECEIVED

5 Packaging \*Declared value limit \$500.  
 FedEx Envelope\*  FedEx Pak  FedEx Box  FedEx Tube  Other

6 Special Handling and Delivery Signature Options  
 SATURDAY Delivery  
 No Signature Required  
 Direct Signature  
 Indirect Signature  
 Does this shipment contain dangerous goods?  
 No  Yes

7 Payment Bill to:  
 Sender  Recipient  Third Party  Credit Card  Cash/Check

Total Packages Total Weight Credit Card Auth.

Your liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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