

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JAN 05 2018

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2017-001671

Lisa E. Crowe, Plaintiffs,

v.

Fred's Stores of Tennessee, Inc., and NARA Properties, LLC, Respondents,

Of Whom Lisa E. Crowe is the Appellant.

RESPONDENT, FRED'S STORES OF TENNESSEE, INC.'S,
MOTION FOR AN EXTENSION

Respondent, Fred's Stores of Tennessee, 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 January 8, 2018. This is Respondent's 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 due to complexity of issues presented by this case. Counsel for Respondent has conferred with counsel for Appellant she has consented to the request for an extension of time.



Respectfully submitted,

Matthew C. LaFave, LLC

January 5, 2018

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

THE STATE OF SOUTH CAROLINA
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Lisa E. Crowe,

Appellant,

v.

Fred's Stores of Tennessee, Inc., and
NARA Properties, LLC,

Defendants,

OF WHOM:

Fred's Stores of Tennessee, Inc., is
the

Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent, Fred's Stores of Tennessee, Inc.'s, Motion for an Extension on Lisa E. Crowe by depositing a copy of it in the United States Mail, postage prepaid, on January 5, 2018, addressed to her attorneys, Wendell L. Hawkins and Aimee V. Leary of Wendell L. Hawkins, PA, 103-C Regency Commons Drive, Greer, South Carolina 29650.

January 5, 2018

Matthew C. LaFave / DCC

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January 5, 2018

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Via Hand Delivery

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

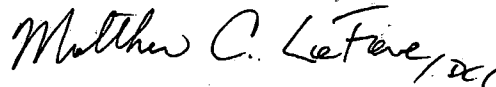
RE: Lisa E. Crowe v. Fred's Stores of Tennessee, Inc. and NARA Properties, LLC
Appellate Case No. 2017-001671
Claim No. 30165234309-0001

Dear Ms. Kitchings:

Please find enclosed for filing an original and six copies of Respondent, Fred's Stores of Tennessee, Inc.'s, Motion for an Extension and Proof of Service relative to the above-captioned 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 the individual presenting them for filing. By copy of this correspondence to the attorneys for the Appellant, I am hereby serving a copy of this Motion on Mr. Hawkins and Ms. Leary.

Sincerely yours,



Matthew C. LaFave

MCL/dmb
Enclosures

cc: Wendell L. Hawkins, Esquire
Aimee V. Leary, Esquire
Jonathan Street, Fred's (via e-mail only)
Shonda Sanders, Fred's (via e-mail only)
Sherrie Johnson, Fred's (via e-mail only)
Carrier (via e-mail only)