

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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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 and Consulting, Inc.

Of Whom

South Carolina Department of  
Transportation; Pilot Travel Centers,  
LLC; Speedway, LLC; Ashley Land  
Surveying, Inc. f/k/a Ashley  
Engineering and Consulting, Inc., ..... Respondents.

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SC Court of Appeals

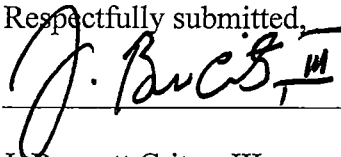
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RESPONDENT SPEEDWAY LLC'S CONSENT MOTION FOR EXTENSION  
OF TIME TO FILE DESIGNATION OF MATTER OUT OF TIME

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Respondent, Speedway LLC, respectfully moves this Court for an Order pursuant to Rules 209 and 263(b), SCACR, to file its Designation of Matter out of time. Respondent's Designation was due on January 29, 2017, but it was inadvertently excluded from its appellate court filing. Respondent's Designation of Matter is attached hereto as Exhibit A. Respondent's Counsel has conferred with counsel of record, all of whom consent to this Motion.

Respectfully submitted,



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J. Bennett Crites, III  
Mary B. Ramsay  
SHUMAKER, LOOP & KENDRICK, LLP  
PO Box 22207  
Charleston, SC 29413  
843-996-1911  
[bcrites@slk-law.com](mailto:bcrites@slk-law.com)  
[mramsay@slk-law.com](mailto:mramsay@slk-law.com)

Charleston, South Carolina  
February 1, 2018

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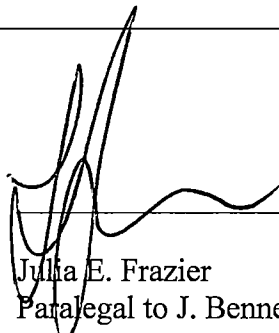
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PROOF OF SERVICE

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The undersigned hereby certifies that on this 1<sup>st</sup> day of February 2018, she served counsel for the Appellants and counsel of record with a copy of Respondent Speedway LLC's Consent Motion for Extension of Time to file Designation of Matter in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

<p>Kevin B. Smith  HOFFMAN LAW FIRM  7087 River Ave.  N. Charleston, SC 29406</p> <p>S. Randall Hood  Jordan C. Calloway  MCGOWAN, HOOD &amp; FELDER, LLC  1539 Health Care Drive  Rock Hill, SC 29732</p> <p><i>Attorneys for Appellants</i></p>	
<p>Roy G. Maybank, Esq.  MAYBANK LAW FIRM  531 Savannah Highway  PO Box 12579  Charleston, SC 29422</p>	<p>Bruce A. Berlinsky, Esq.  BRUCE A. BERLINSKY, P.A.  PO Box 206 (29402)  One Carriage Lane, Bldg. F  Charleston, SC 29407</p>
<p>William G. Besley, Esq.  Jeffrey I. Silverberg  HOWER, NEWMAN, &amp; BESLEY, LLC  1508 Washington Street  PO Box 12009  Columbia, SC 29211</p>	




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Julia E. Frazier  
Paralegal to J. Bennett Crites, III and  
Mary B. Ramsay  
SHUMAKER, LOOP & KENDRICK, LLP

J. BENNETT CRITES, III  
[bcrites@slk-law.com](mailto:bcrites@slk-law.com)  
Ph. 843.996.1911

February 1, 2018

**VIA FEDEX**

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: *Cynthia Wright and Richard Wright v. SCDOT, et al.*  
Appellate Case No.: 2017-001563  
Our File No. 218601

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SC Court of Appeals

Dear Sir/Madam:

Enclosed for filing please find the original and one (1) copy of Respondent Speedway, LLC's Consent Motion for Extension of Time to File Designation of Matter Out of Time regarding the above-referenced matter. Please file the original and return a file-stamped copy to me in the enclosed self-addressed, stamped envelope. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,

SHUMAKER, LOOP & KENDRICK, LLP

Julia E. Frazier  
Paralegal to J. Bennett Crites, III, Esq.

/jef

Enclosures

Cc: Kevin B. Smith, Esq.  
S. Randall Hood, Esq.  
Jordan C. Calloway, Esq.  
Shawn B. Deery, Esq.  
Bruce A. Berlinsky, Esq.  
Jeffrey I. Silverberg, Esq.  
William G. Besley, Esq.  
Roy G. Maybank, Esq.  
Amanda Maybank, Esq.

✓

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JULIA FRAZIER

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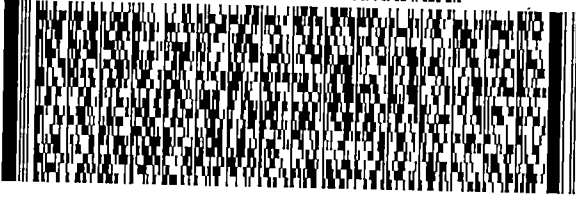
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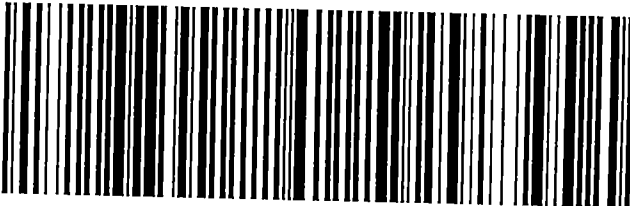
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