

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2017-000902

**RECEIVED**  
FEB 08 2018  
SC Court of Appeals

Daniel O'Shields And Roger W.  
Whitley, A Partnership d/b/a O&W Cars,

Appellants

v.

Columbia Automotive Company,  
LLC d/b/a Midlands Honda,

Respondent.

Motion for Extension of Time

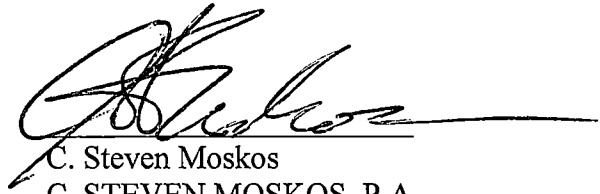
Appellants respectfully request a 20-day extension of time from today's date in which to file their Initial Brief and Designation of Matter. Respondent consents to Appellants' motion. This is Appellants' fourth motion for an extension of time following the consolidation of the two appeals.

The reason for this request stems from a pipe in Mr. Fudenberg's wall having sprung a leak, apparently as a result of the freezes in Charleston. The water built up for some time before he noticed it coming out of the kitchen floor. His kitchen floor is now soaked. He has had meetings with plumbers, an adjuster, remediation specialist, carpenter, and asbestos inspector, and many telephone calls with two adjusters, independent insurance agent, and other asbestos, plumbing, and remediation firms, and the process is not over yet.

*[Signature block on next page]*

Respectfully submitted,

February 5, 2018

A handwritten signature in black ink, appearing to read "C. Moskos", with a long horizontal flourish extending to the right.

C. Steven Moskos  
C. STEVEN MOSKOS, P.A.  
4000 Faber Place Drive, Suite 300  
N. Charleston, SC 29407  
Telephone: (843) 763-5297  
Email: [csmoskos@earthlink.net](mailto:csmoskos@earthlink.net)  
Attorney for Appellants

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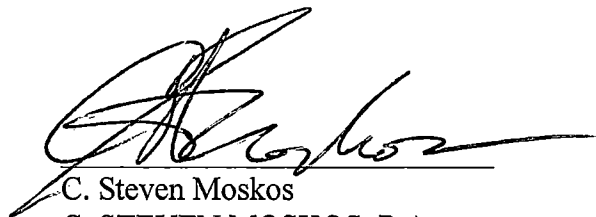
Columbia Automotive Company,  
LLC d/b/a Midlands Honda,

Respondent.

PROOF OF SERVICE

I certify that I have served the foregoing Motion to Extend Time on Columbia Automotive Company, LLC d/b/a Midlands Honda by depositing a copy of it in the United States Mail, postage prepaid, on today's date, addressed to its attorney of record Harry Clayton Walker Jr., Esq., Haynsworth Sinkler Boyd, PA, PO Box 11889, Columbia, SC 29211-1889.

2/5/2018



C. Steven Moskos  
C. STEVEN MOSKOS, P.A.  
4000 Faber Place Drive, Suite 300  
N. Charleston, SC 29407  
Telephone: (843) 763-5297  
Email: csmoskos@earthlink.net

# C. STEVEN MOSKOS, P.A.

Attorney and Counselor at Law

C. Steven Moskos  
Board Certified Civil Trial Attorney  
Board Certified Civil Pretrial Advocate  
By the National Board of Trial Advocacy  
Supreme Court of South Carolina Certified Mediator

M

4000 Faber Place Drive, Suite 300  
North Charleston, SC 29405  
Telephone: (843) 763-5297  
www.moskoslawfirm.com  
csmoskos@earthlink.net

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Daniel O'Shields and Roger W. Whitley A Partnership d/b/a O&W Cars v. Columbia Automotive Company, LLC d/b/a Midlands Honda  
Appellate Case No. 2017-000902

Dear Ms. Kitchings:

Please find enclosed:

- \* an original and seven (7) copies of a Motion to Extend Time in this case,
- \* an original proof of service regarding the same,
- \* a check in the amount of \$25.00 as the filing fee, and
- \* a self-addressed, stamped envelope.

I would ask that you return a stamped copy of the motion in the enclosed self-addressed envelope.

Sincerely,



C. Steven Moskos  
C. STEVEN MOSKOS, P.A.  
Attorney for Appellants

cc: Harry Clayton Walker Jr., Esq. Robert Reibold, Esq. James Y. Becker, Esq.  
Sarah P. Spruill, Esq. Brooks R. Fudenberg, Esq.

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**SHIP TO:** The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629



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SC Court of Appeals