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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2016-CP-10-4112

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FEB 14 2018
SC Court of Appeals

Jane Doe, an adult woman over the age of 18,

Respondent,

v.

TCSC, LLC, d/b/a Hendrick Toyota of North Charleston,

Appellant.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL REPLY BRIEF**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley, Jr. (SC Bar No. 994)
Nicholas J. Rivera (SC Bar No. 77186)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

*Counsel for Appellant
TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant TCSC, LLC, d/b/a Hendrick Toyota of North Charleston, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal.

Respondent served her initial brief on February 2, 2018 making the current deadline for Appellant's initial reply brief and designation of matter today, February 12, 2018, according to Rule 208(a)(3). On account of work-related and other time commitments, Appellant's counsel respectfully requests that this deadline be extended by 10 days (from February 12, 2018), i.e., through February 22, 2018. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an extension of 10 days' time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial reply brief and designation of matter would be February 22, 2018, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold its

present initial-reply-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By:  _____

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*Counsel for Appellant
TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston*

Charleston, South Carolina

Dated: 2/12/18

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Jane Doe, an adult woman over the age of 18,

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Appellant.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP

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Counsel for Appellant

*TCSC, LLC, d/b/a Hendrick Toyota of
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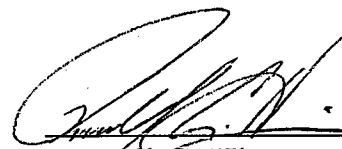
I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on February 12, 2018, properly posted for delivery to the following addressees:

THE MASON LAW FIRM, P.A.
Tidewatch Centre on Shem Creek
Mark A. Mason, Esquire
Anthony E. Forsberg, Esquire
465 West Coleman Boulevard, Suite 302
Mount Pleasant, South Carolina 29464

Counsel for Respondent
Jane Doe, an adult woman over the age of 18

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By:

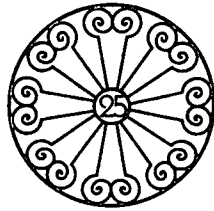


Russell G. Hines (SC Bar No. 72100)

Counsel for Appellant
TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston

Charleston, South Carolina

Dated: 2/12/18



YCR LAW

Kathleen B. Barnes
Secretary

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February 12, 2018

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

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SC Court of Appeals

Re: Jane Doe vs. TCSC, LLC d/b/a Hendrick Toyota of North Charleston
Appellate Case No. 2017-001216
Case No.: 2016-CP-10-4112
Claim No.: 30166435427-0001 / BHSI - LI609011506
Date of Loss: 1/19/2016
YCR File: 11176-20160726

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to File/Serve Initial Reply Brief and the original and one (1) copy of the Proof of Service of same. I am also enclosing our firm's check in the amount of \$25.00 to cover the cost of the Motion. Please file the originals and return court-stamped copies of each to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

Enclosures

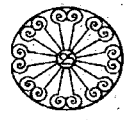
cc: Mark A. Mason, Esquire, The Mason Law Firm, P.A.
Anthony E. Forsberg, Esquire, The Mason Law Firm, P.A.

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