

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Hon. Kristi L. Harrington, Circuit Court Judge
Case No. 2015-CP-10-06615
(Appellate Case No. 2017-001532)

BOUCHELLE INCORPORATED,

Appellant,

vs.

CHARLESTON WRECKING, INC. and MICHAEL C. GOLEMIS,

Respondents.

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FEB 20 2018
SC Court of Appeals

**APPELLANT’S MOTION FOR EXTENSION OF
TIME TO FILE AMENDED INITIAL BRIEF AND
AMENDED DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

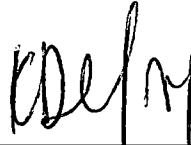
Appellant, by and through its’ undersigned counsel, moves, pursuant to Rule 224, South Carolina Appellate Court Rules, for an extension of time within which to file its’ Amended Initial Brief and Amended Designation of Matter to be Included in the Record on Appeal.

This Motion is based upon the grounds that due to the fact that the deadline date of February 17, 2018 was on a Saturday and that businesses and courts are closed today for Presidents Day, in conjunction with a heavy caseleoad, counsel for Appellant has not had sufficient time or opportunity to complete the Amended Initial Brief and Amended Designation of Matter to be Included in the

Record on Appeal until Saturday, February 17, 2018 of which copies were faxed to the Court and emailed to all counsel of record.

We would respectfully request a five (5) day extension of time to file Appellant's Amended Initial Brief and Amended Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted this 19th day of February, 2018.



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Attorney for Respondent Michael C. Golemis

STATE OF SOUTH CAROLINA
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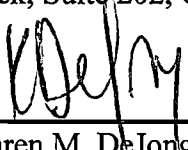
Respondents.

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Amended Appellant's Initial Brief, the Amended Designation of Matter to be Included on the Record on Appeal, and Certificate of Counsel with names, mailing addresses and telephone numbers of all attorneys of record, in compliance with Rule 203, SCACR, on Respondents Charleston Wrecking, Inc. and Michael C. Golemis by USPS overnight mail on February 19, 2018, addressed to their attorneys of record, Kerry W. Koon, 147 Wappoo Centre, Suite 203, Charleston, SC 29412 (for Respondent Charleston Wrecking, Inc.) and Michael W. Sautter of Query Sautter Forsythe, LLC, 147 Wappoo Creek, Suite 202, Charleston, SC 29412 (for Respondent Michael C. Golemis).

February 19, 2018



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SENT VIA FAX ON 2/17/2018
AND OVERNIGHT MAIL ON 2/19/2018
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February 19, 2018

Hon. Jenny Abbott Kitchings
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: Bouchelle Incorporated v. Charleston Wrecking, Inc., et al.
Appellate Case No. 2017-001532

Dear Hon. Kitchings:

Enclosed please find the original and a copy of Appellant's Motion for an Extension with which to file Appellant's Amended Initial Brief, Amended Designation of Matter to be Included in Record on Appeal, Certificate of Counsel and Proof of Service. Please return a filed copy in the self-addressed stamped envelope which is enclosed for your convenience.

Very truly yours,


Karen M. DeJong

KMD:abc
Cc: Mr. Kerry Koon
Mr. Michael Sautter

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