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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAR 21 2018

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Phillip Lenski, Administrative Law Judge

Case No. 2017-000968

Richard Beltram,
Appellant/Respondent,

v.

South Carolina Department of Revenue,
Respondent/Appellant.


**MOTION TO EXTEND TIME TO FILE APPELLANT/RESPONDENT RICHARD
BELTRAM'S INITIAL BRIEF OF RESPONDENT**

Appellant/Respondent Richard Beltram submits this motion pursuant to Rule 240, SCACR requesting an extension of thirty (30) days within which to file his Initial Respondent's Brief in response to Respondent/Appellant South Carolina Department of Revenue's Initial Appellant's Brief. Counsel has been unable to devote sufficient time and resources to the preparation of this brief due to her litigation schedule and a week-long illness. Counsel therefore requires this

additional time to adequately respond to the issues lengthy and numerous issues raised in this cross-appeal. This motion is not interposed for delay, and will not prejudice the DOR, as Mr. Beltram has made the provisional payment of the monies sought by the DOR and that are the subject of this appeal.

Appellant/Respondent therefore respectfully requests that the Court grant this extension, making the Appellant/Respondent's Brief of Respondent due on or before April 18, 2018. Appellant/Respondent further requests that the Court hold all time limits in abeyance while considering this motion.

THE WARD LAW FIRM, P.A.
Attorneys for Appellant



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March 19, 2018

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Appellant/Respondent Richard Beltram's Motion to Extend Time to File Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal was served upon all parties of record on March 19, 2018 by depositing copies of the same via process service and/or United States mail, postage affixed, to the following address:

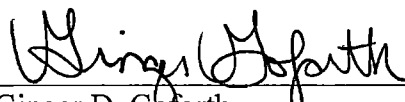
South Carolina Department of Revenue
Nicole M. Wooten
William J. Condon, Jr.

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SC Court of Appeals

Jason P. Luther
Office of General Counsel for Litigation
South Carolina Department of Revenue
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March 19, 2018

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

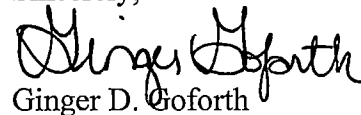
**RE: Richard Beltram v. South Carolina Department of Revenue
Appellate Case No. 2017-000968**

Dear Ms. Kitchings:

Enclosed for filing please find an original and seven copies of Appellant/Respondent Richard Beltram's Motion to Extend Time to File Appellant/Respondent's Initial Brief of Respondent, along with the \$25 filing fee, and certificate of service. Please return a filed copy of the same in the enclosed postage-paid envelope.

Thank you for your consideration,

Sincerely,


Ginger D. Goforth

GDG/

cc: South Carolina Department of Revenue

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SC Court of Appeals

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John E. Rogers, II
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