

80524

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Phillip Lenski, Administrative Law Judge

Case No. 2017-000968

RECEIVED
APR 20 2018
SC Court of Appeals

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**

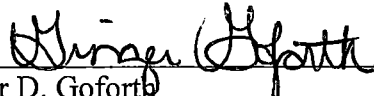
Appellant/Respondent Richard Beltram submits this motion pursuant to Rule 240, SCACR requesting a brief and limited extension of fifteen (15) days within which to file his Initial Respondent's Brief in response to Respondent/Appellant South Carolina Department of Revenue's Initial Appellant's Brief. Beltram also requests by way of this motion that the Court grant him leave to file at the same time his Reply Brief. Counsel has still been unable to devote sufficient

✓

time and resources to the preparation of this brief per the previous motion, and needs this brief additional extension. This motion is not interposed for delay, will not prejudice the DOR, and conversations with DOR counsel indicate that DOR is not opposed to the motion.

Appellant/Respondent therefore respectfully requests that the Court grant this extension, making the outstanding briefs due on or before May, 2018. Appellant/Respondent further requests that the Court hold all time limits in abeyance while considering this motion. Appellant/Respondent further submits that it will not request any further briefing extensions.

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



Ginger D. Goforth
P.O. Box 5663
Spartanburg, SC 29304
(864) 591-2344
(864) 585-3090 (fax)
ggoforth@wardfirm.com

April 18, 2018

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Phillip Lenski, Administrative Law Judge

Case No. 2017-000968

RECEIVED
APR 20 2018
SC Court of Appeals

Richard Beltram,
Appellant/Respondent,

v.

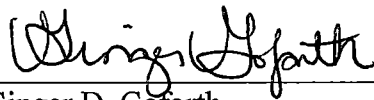
South Carolina Department of Revenue,
Respondent/Appellant.

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 April 18, 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.

Jason P. Luther
Office of General Counsel for Litigation
South Carolina Department of Revenue
300A Outlet Pointe Boulevard
P.O. Box 12265
Columbia, SC 29211



Ginger D. Goforth

THE WARD LAW FIRM, P.A.

ATTORNEYS AT LAW
POST OFFICE BOX 5663
SPARTANBURG, SOUTH CAROLINA 29304

H. SPENCER KING♦
K. LINDSAY TERRELL♦
ROBERT E. DAVIS*
JASON M. IMHOFF
JOHN E. ROGERS, II*
GINGER D. GOFORTH
C. REED TEAGUE
CHAD M. GRAHAM

▪ RETIRED
♦ CERTIFIED MEDIATOR
* ALSO MEMBER NORTH CAROLINA BAR
• ALSO MEMBER GEORGIA BAR

RUFUS M. WARD (1908-1988)
L. PAUL BARNES (1931-1986)

233 SOUTH PINE STREET
SPARTANBURG, S.C. 29302
FAX. No. (864) 585-3090
OFFICE No. (864) 573-8500

E-mail: ggoforth@wardfirm.com
Direct No. 864-591-2344

April 18, 2018

RECEIVED

APR 20 2018

SC Court of Appeals

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

DATE : Apr/18/2018
CHE # : 63845
AMOUNT : \$25.00
ACCOUNT: GENERAL - 36
PAID TO: South Carolina Court of Appeals

RECEIVED
APR 20 2018
SC Court of Appeals

COPY

E112
Court Fees -filing Appellant/Respondent's Motion to Extend Time/Brief

CLIENT: Beltra - Beltram, Richard
MATTER: 2017-0166

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER 63845

THE WARD LAW FIRM, P.A.
P.O. BOX 5663
SPARTANBURG, SC 29304

CAPITAL BANK

63845

63-1176/670

Twenty Five ***** 00/100

PAY TO THE ORDER OF South Carolina Court of Appeals

DATE AMOUNT
Apr/18/2018 \$25.00

THE WARD LAW FIRM, P.A.

VOID AFTER 90 DAYS

SAFEGUARD ECUK SAFEGUARD ECUK

COURT FEES - FILING APPELLANT/RESPONDENT'S MOTION TO EXTEND TIME/BRIEF

THE WARD LAW FIRM, P.A., ATTORNEYS

63845

DATE : Apr/18/2018
CHE # : 63845
AMOUNT : \$25.00
ACCOUNT: GENERAL - 36
PAID TO: South Carolina Court of Appeals
Court Fees -filing Appellant/Respondent's Motion to Extend Time/Brief
Beltra - Beltram, Richard
MATTER :2017-0166
LAWYER :Ginger D. Goforth
P.O. Box 5271

** GENERAL BALANCES **
UNBILLED DISBS: 150.00
A/R BALANCE : 0.00

** TRUST BALANCES **

TRUST BALANCE : 0.00

Spartanburg
SC
29304
Richard Beltram vs. South Carolina Department of Revenue

NEUPOST

04/18/2018

US POSTAGE \$002.47⁰



ZIP 29302
041L11259525

RECEIVED

APR 20 2018

SC Court of Appeals

MC

The Ward Law Firm, P.A.
Attorneys at Law
233 South Pine Street
P. O. Box 5663
Spartanburg, South Carolina 29304

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