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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2018-000092

RECEIVED
MAY 01 2018
SC Court of Appeals

Stokes-Craven Holding Corp. d/b/a Stokes-Craven Ford, Appellant

v.

Scott L. Robinson and Johnson, McKenzie & Robinson, LLC, Respondents

APPELLANT'S MOTION FOR EXTENSION OF TIME

The Notice of Appeal in this matter was served on January 17, 2018. Pursuant to the time provisions of Rule 207(a)(1), SCACR, transcripts of the proceedings before the lower court, if needed, were to be ordered via written request, mailed to the court reporter(s), on or before January 29, 2018.

Due to the nature of the underlying dispute, multiple transcripts of proceedings before the lower court had been requested and received prior to service of the Notice of Appeal. Correspondence requesting those transcripts (copies attached) was not contemporaneously copied to opposing counsel or the Clerk of the Court of Appeals because no Notice of Appeal had yet been served.

On February 6, 2018 – prior to the time when the Appellant's initial brief and designation were due under Rules 208(a)(1) and 209(a), SCACR – the Court notified the parties *sua sponte* of its interest in examining the appealability of the lower court's ruling, during which examination

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briefing deadlines were suspended. The thereafter Court notified counsel for the parties of its decision to allow the appeal to proceed on April 23, 2018.

Appellant therefore moves for an extension of time until June 1, 2018 within which to file and serve its initial brief and designation.

Respectfully submitted,

By: Robert B. Ransom

Robert B. Ransom
LEVENTIS & RANSOM
Post Office Box 11067
Columbia, SC 29211
(803) 765-2383
Attorney for the Appellant

Other counsel of record:

Warren C. Powell, Jr.
BRUNER, POWELL, WALL & MULLINS, LLC
Post Office Box 61110
Columbia, SC 29260-1110

Attorney for the Respondent Johnson, McKenzie & Robinson, LLC

Susan Taylor Wall
GORDON, REES
170 Meeting Street, Suite 170
Charleston, SC 29401

ANDREW K. EPTING, JR., LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

October 26, 2017

Keshia T. Reed
Post Office Box 12190
Florence, SC 29504-2190

RE: *Stokes-Craven Holding Corp. DBA Stokes-Craven Ford v. Scott L. Robinson and Johnson McKenzie and Robinson, LLC*
Case No. 2010-CP-14-457

Dear Ms. Reed:

Motion hearings were conducted before Judge Nettles, Circuit Judge in Florence County, on October 13, 2017, October 17, 2017, and October 19, 2017 in the above-captioned matter. Our records indicate that you were the court reporter for those hearings. I request that you provide me with an expedited transcript of the entire proceedings on those dates. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

With kindest regards,

ANDREW K. EPTING, JR., LLC

s/Jaan

Jaan G. Rannik

JGR/agg

ANDREW K. EPTING, JR., LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

November 3, 2017

Krystal J. Smith
PO Box 13563
Florence, SC 29504

RE: *Stokes-Craven Holding Corp. DBA Stokes-Craven Ford v. Scott L. Robinson and
Johnson McKenzie and Robinson, LLC*
Case No. 2010-CP-14-457

Dear Ms. Smith:

Defendants' Motion to Exclude Expert Witnesses, or, in the Alternative, to Disqualify Plaintiff's Counsel was conducted before Judge Nettles, Circuit Judge in Clarendon County, on November 2, 2017 in the above-captioned matter. Our records indicate that you were the court reporter for those hearings. I request that you provide me with an expedited transcript of the entire proceedings on that date. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

With kindest regards,

ANDREW K. EPTING, JR., LLC

s/Jaan

Jaan G. Rannik

JGR/agg

ANDREW K. EPTING, JR., LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

November 9, 2017

VIA EMAIL: KRSMITH@SCCOURTS.ORG

Krystal J. Smith
PO Box 13563
Florence, SC 29504

RE: *Stokes-Craven Holding Corp. DBA Stokes-Craven Ford v. Scott L. Robinson and
Johnson McKenzie and Robinson, LLC*
Case No. 2010-CP-14-457

Dear Ms. Smith:

Defendants' Motion to Exclude Expert Witnesses, or, in the Alternative, to Disqualify Plaintiff's Counsel was conducted before Judge Nettles, Circuit Judge in Florence County, on October 13, 2017 in the above-captioned matter. Our records indicate that you were the court reporter for this hearing. I request that you provide me with an expedited transcript of the entire proceedings on that date. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

With kindest regards,

ANDREW K. EPTING, JR., LLC

s/Jaan

Jaan G. Rannik

JGR/agg

ANDREW K. EPTING, JR., LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

December 22, 2017

VIA EMAIL: ndahl@sccourts.org

Natalie Dahl, RPR
Post Office Box 762
Conway, SC 29528

RE: *Stokes-Craven Holding Corp. DBA Stokes-Craven Ford v. Scott L. Robinson and Johnson McKenzie and Robinson, LLC*
Case No. 2010-CP-14-457

Dear Ms. Dahl:

Plaintiff's Motion to Reconsider was conducted before Judge Nettles, Circuit Judge in Florence County, on December 21, 2017 in the above-captioned matter. Our records indicate that you were the court reporter for this hearing. I request that you provide me with an expedited transcript of the entire proceedings on that date. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

With kindest regards,

ANDREW K. EPTING, JR., LLC

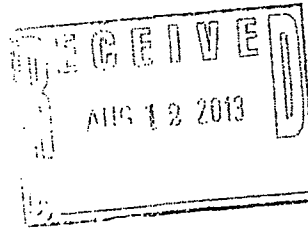
s/Jaan

Jaan G. Rannik

JGR/agg

cc: Robert Ransom, Esq.

State of South Carolina)
County of Clarendon)



Stokes-Craven Holding d/b/a Stokes Craven Ford
Plaintiffs

2010-CP-14-00457
Motions

vs.

Scott L. Robinson and Johnson McKenzie
and Robinson, LLC
Defendants

April 4, 2012
Manning, S.C.

Before the Honorable Clifton Newman, Judge.

A-P-P-E-A-R-A-N-C-E-S

Mr. Andrew K. Epting, Jr.
Attorney for Plaintiff

Mr. James L. Bruner,
Attorney for defendant Stokes

Ms. Amanda Coney Williams,
Attorney for defendant Johnson McKenzie

Margaret T. Sullivan
Court Reporter

State of South Carolina)
County of Clarendon)

In The Court of Common Pleas
Third Judicial Circuit
2010-CP-14-0457

Stokes-Craven Holding Corp.,)
et al.,)

Plaintiffs,)

vs.)

Scott L. Robinson, et al.,)

Defendants.)

Transcript of Record

July 11, 2012
Manning, South Carolina

B E F O R E:

The Honorable Clifton B. Newman, Judge

A P P E A R A N C E S:

Andrew K. Epting, Jr., Esquire
Attorney for the Plaintiff

Warren C. Powell, Jr., Esquire
Attorney for Defendant Johnson, McKenzie, & Robinson, LLC

Amanda C. Williams, Esquire
Attorney for Defendant Scott Robinson

Elizabeth B. Harris, CVR-M
Circuit Court Reporter

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS

COUNTY OF CLARENDON) 2010-CP-14-457

STOKES-CRAVEN HOLDING)
COMPANY, D/B/A STOKES-)
CRAVEN FORD,)

Plaintiff,)

vs.)

SCOTT L. ROBINSON AND)
JOHNSON, MCKENZIE,)
ROBINSON, LLC,)

Defendants.)

Transcript of Record
(Motion Hearing)

July 25, 2017

B E F O R E:

Honorable Michael G. Nettles
Marion County Courthouse
Marion, South Carolina

A P P E A R A N C E S:

Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire
Attorney for Plaintiff

Warren C. Powell, Jr., Esquire
Susan Taylor Wall, Esquire
Attorney for Defendants

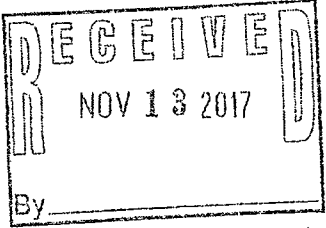
TAKEN BY:

Dixie C. Eubank
Circuit Court Reporter

PREPARED BY:

Kay H. Richardson
Circuit Court Reporter

State of South Carolina)	Court of Common Pleas
)	Third Judicial Circuit
County of Clarendon)	Case No. 2010-CP-14-00457
)	
Stokes-Craven Holding Corp.,)	
)	
Plaintiff,)	
)	
-vs-)	Transcript of Record
)	
Scott L. Robinson, et. al.,)	
)	
Defendants.)	



October 13, 2017
Florence, South Carolina

B E F O R E:

The Honorable Michael G. Nettles, Judge

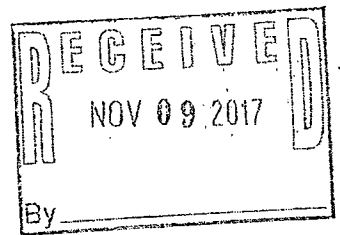
A P P E A R A N C E S:

Andrew K. Epting, Jr., Esquire
Jaan Rannik, Esquire
Attorneys for the Plaintiff

Warren C. Powell, Jr., Esquire
Susan Wall, Esquire
Attorneys for the Defendants

Krystal J. Smith
Circuit Court Reporter

State of South Carolina)	Court of Common Pleas
)	Third Judicial Circuit
County of Clarendon)	Case No. 2010-CP-14-00457
)	
Stokes-Craven Holding Corp.,)	
)	
Plaintiff,)	
)	
-vs-)	Transcript of Record
)	
Scott L. Robinson, et. al.,)	
)	
Defendants.)	



November 2, 2017
 Florence, South Carolina

B E F O R E:

The Honorable Michael G. Nettles, Judge

A P P E A R A N C E S:

Andrew K. Epting, Jr., Esquire
 Jaan Rannik, Esquire
 Attorneys for the Plaintiff

Warren C. Powell, Jr., Esquire
 Susan Wall, Esquire - via telephone
 Attorneys for the Defendants

Krystal J. Smith
 Circuit Court Reporter

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2018-000092

RECEIVED
MAY 01 2018
SC Court of Appeals

Stokes-Craven Holding Corp. d/b/a Stokes-Craven Ford, Appellant

v.

Scott L. Robinson and Johnson, McKenzie & Robinson, LLC, Respondents

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time on the Respondents Scott L. Robinson and Johnson, McKenzie & Robinson, LLC by depositing a copy of it in the United States Mail, postage prepaid, on January 17, 2018, addressed to their respective attorneys of record, Susan Taylor Wall and Warren C. Powell, Jr.

May 1, 2018

By: 

Robert B. Ransom
Leventis & Ransom
Post Office Box 11067
Columbia, SC 29211... Appellant
(803) 765-2383
Attorney for the Appellant

LEVENTIS & RANSOM

ATTORNEYS AT LAW

Post Office Box 11067
Columbia, South Carolina 29211

1913 Bull Street
Columbia, South Carolina 29201

Telephone (803) 765-2383
Facsimile (803) 799-1612 (fax)

James J. Leventis
jjleventis@aol.com

Robert B. Ransom
bertcone@aol.com

May 1, 2018

RECEIVED
MAY 01 2018
SC Court of Appeals

Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Stokes-Craven Holding Corp. d/b/a Stokes-Craven Ford v. Scott L. Robinson and Johnson, McKenzie & Robinson, LLC
Appellate Case No. 2018-000092

Dear Ms. Kitchings:

Enclosed for filing, please find an original and six (6) copies of the Appellant's Motion for Extension of Time, along with my office check for the \$25.00 filing fee.

Thank you for your attention to this matter. Please call me if you have any questions or comments.

Very truly yours,



Robert B. Ransom

Enclosures

c: Warren C. Powell, Jr., Esq.
Susan Taylor Wall, Esq.
Andrew K. Epting, Jr., Esq.