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SC Court of Appeals

July 3, 2018

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

RE: Oldcastle APG South, Inc., d/b/a Adams Products Company, and
Oldcastle APG Northeast, Inc., d/b/a Foster-Southeastern, Respondents v.
Daniel B. Albert, Appellant
Civil Action No.: 2014-CP-23-05031
Appeal No.: 2017-002183

Dear Ms. Kitchings:

I, Daniel B Albert, Appellant in this matter, received the Initial Brief of Respondents on June 6, 2018. On June 16, 2018, I requested a thirty day extension to the ten days allowed for the filing of Appellant's Reply Brief. Respondent objected to my request because I did not cite reasons for requesting an extension of time. This court ordered that my Reply Brief is due July 5, 2018.

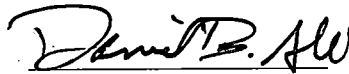
I hereby request a thirty day extension to file my reply brief. I have several reasons for making this request. First, much of my time and attention until June 25, 2018 was taken up by another matter that I had under appeal involving the foreclosure on my home. Second, I had made plans to travel out of state for the month of July and the first two weeks of August many months ago. Third, Respondent's Initial Brief presents a lot of information that simply takes more time for me to digest and respond to than it might take for a law firm to digest and respond to.

When scheduling a future hearing during a March 8, 2017 status conference before Judge Gravely last year, Ms. McMillan, attorney for Respondent, cited as a reason to Judge Gravely for blocking out the entire month of May for the hearing was because her daughter was graduating from high school. Because she had a trip to Jamaica scheduled for the first week of June last year, and she needed a week after that vacation to catch up, Judge Gravely scheduled the hearing in this matter for June 15, 2017. At that time, I did not object to the rather extensive delay in scheduling a hearing in this matter, and the reality is that the hearing and the work I had to do to file a motion to reconsider in this matter, and the other activities on the other case precluded me from taking the trip last year that I am now on. Under these circumstances, I believe that my request is reasonable, and I ask that this court grant my request for a thirty day extension of time to file my Reply Brief.

Enclosed is the required \$25 motion fee.




Sincerely,

A handwritten signature in black ink, appearing to read "Daniel B. Albert", with a long horizontal line extending to the right from the end of the signature.

Daniel B. Albert
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Appellant, *pro se*

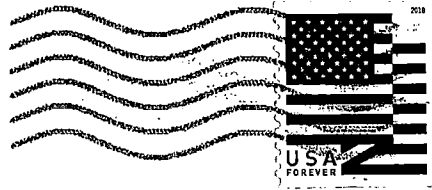
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