

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2018-000171

**RECEIVED**  
SEP 10 2018  
SC Court of Appeals

Cleo Sanders,

Respondent

v.

Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram, Santander Consumer US Holdings Inc., Isiah S. White, Danny Anderson, and Patrick Bachrodt, Jr.  
Defendants

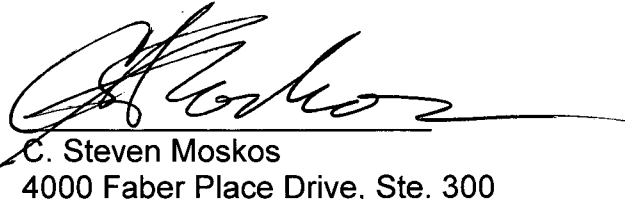
Of whom Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White,  
Appellants.

Motion for Extension of Time

Respondent respectfully requests a 30-day extension from today's date in which to file his Initial Response Brief, which is otherwise due today. This is Respondent's third request for an extension of time in this matter. Respondent's counsel is a sole practitioner. In addition to researching the law and writing a brief for this matter, he has to handle all the other matters in his office, including responding to clients, preparing for hearings, and filing complaints and motions. Additionally, Respondent's counsel had Labor Day vacation plans which prevented him from finishing Respondent's Brief.

Opposing counsel consents to Respondent's motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Moskos", with a long horizontal flourish extending to the right.

C. Steven Moskos  
4000 Faber Place Drive, Ste. 300  
Charleston, SC 29405  
Telephone: (843) 763-5297  
Attorney for Respondent

Charleston, South Carolina  
September 5, 2018

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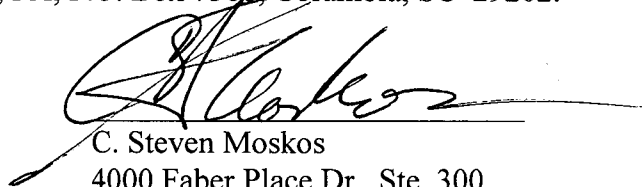
Defendants,

Of whom Savannah Highway Automotive Company, a  
General Partnership d/b/a Rick Hendrick Dodge Chrysler  
Jeep Ram and Isiah S. White,

Appellants.

PROOF OF SERVICE

I certify that I have served the foregoing Motion to Extend Time on Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White by depositing a copy of it in the United States Mail, postage prepaid, on September 5, 2018, addressed to its attorneys of record John T. Lay, Jr., Jessica A. Waller, and Alice P. Adams at Gallivan, White and Boyd, PA, P.O. Box 7368, Columbia, SC 29202.



C. Steven Moskos  
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# C. STEVEN MOSKOS, P.A.

Attorney and Counselor at Law

C. Steven Moskos  
Board Certified Civil Trial Attorney  
Board Certified Civil Pretrial Advocate  
By the National Board of Trial Advocacy  
Supreme Court of South Carolina Certified Mediator

M

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September 5, 2018

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

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**Re: Cleo Sanders vs. Savannah Highway Automotive Company, et. al.**  
**Appellate Case No. 2018-000171**

Dear Ms. Kitchings:

Please find enclosed:

1. An original and seven (7) copies of a Motion to Extend Time in this case.
2. An original proof of service regarding the same,
3. A check in the amount of \$25.00 as the filing fee, and
4. A self-addressed, stamped envelope.

I would ask that you return a stamped copy of the motion in the enclosed self-addressed envelope.

If you have any questions, please do not hesitate to contact me.

Sincerely,



**C. STEVEN MOSKOS**

CSM/slf

Enclosures

cc: John T. Lay, Jr., Esq.  
Cleo Sanders

J

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P.O. Box 11629  
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