

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In the Court of Common Pleas for the Ninth Circuit

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2018-001158

RECEIVED
SEP 24 2018
SC Court of Appeals

Curtis MillsRespondent

v.

The South Carolina State Ports AuthorityAppellant

CONSENT MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF AND
DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL

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(843) 577-7700 Fax: (843) 577-7708
*Counsel for Appellant The South Carolina
State Ports Authority*

Other Counsel of Record:

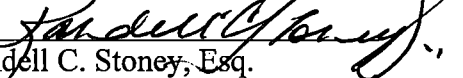
Ladson F. Howell, Jr., Esq.
Howell & Christmas, LLC
PO Box 1896
Mount Pleasant, SC 29465
Counsel for Respondent Curtis Mills

AND NOW COMES Appellant The South Carolina State Ports Authority ("SPA") and files the following Consent Motion for Extension of Time to Serve Appellant's Brief and Designation of Matter for Inclusion in the Record on Appeal:

1. Appellant received the trial transcript in this matter on August 26, 2018.
2. As a result, pursuant to S.C.R.A.P., Rule 208(a)(1), SPA's Initial Appellant's Brief and Designation of Matter for the Record on Appeal are due on September 25, 2018.
3. In order to have time to sufficiently prepare a response, Respondent SPA respectfully requests a thirty (30) day extension to serve and file its Initial Appellant's Brief and Designation of Matter for the Record on Appeal.
4. With the extension, Respondent SPA's Initial Appellant's Brief and Designation of Matter for the Record on Appeal would then be due on October 25, 2018.
5. Respondent SPA has not previously requested an extension of time to serve and file its Initial Appellant's Brief and Designation of Matter for the Record on Appeal.
6. Counsel for Respondent has graciously consented to the extension requested herein.

September 21, 2018

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By: 
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***Counsel for Appellant The South Carolina State
Ports Authority***



Randell C. Stoney, Jr., Esquire
rstoney@barnwell-whaley.com

September 21, 2018

2207.135

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings, Clerk
The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED

SEP 24 2018

SC Court of Appeals

Re: Curtis Mills v. South Carolina State Ports Authority
Appellate Case No. 2018-001158

Dear Ms. Kitchings:

Enclosed for filing are the original and seven copies of a Consent Motion for Extension of Time to File Appellant's Brief and Designation of Matter for Inclusion in the Record on Appeal in the above matter along with the original and one copy of a Proof of Service. Also enclosed is our firm's check in the amount of \$25.00 for the filing fee. Upon filing, please return a clocked copy of each to me in the envelope enclosed for your convenience.

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

With kind regards, I am

Sincerely,

Randell C. Stoney, Jr.

RCSjr/jgc
Enclosures

cc: Ladson Howell, Jr., Esquire
Randolph R. Lowell, Esquire

{00834918.DOCX.1 }

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

THE STATE OF SOUTH CAROLINA
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v.


The South Carolina State Ports AuthorityAppellant

PROOF OF SERVICE

I certify that I have served the Appellant The South Carolina State Ports Authority's Consent Motion for Extension of Time to File Initial Appellant's Brief and Designation of Matter for Inclusion in the Record on Appeal on the above-referenced Respondent by depositing a copy of it in the United States Mail, postage prepaid, on September 21, 2018, addressed to his attorneys of record:

Ladson F. Howell, Jr., Esq.
Howell & Christmas, LLC
PO Box 1896
Mount Pleasant, SC 29465
Attorneys for Respondent Curtis Mills

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By: 
Randell C. Stoney, Esq.
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***Counsel for Appellant The South Carolina State
Ports Authority***

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SC Court of Appeals



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- FedEx Standard Overnight
Next business afternoon.*
Saturday Delivery NOT available.

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- FedEx 2Day A.M.
Second business morning.*
Saturday Delivery NOT available.
- FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Express Saver
Third business day.*
Saturday Delivery NOT available.

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- FedEx Envelope*
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Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

- No Signature Required
Packages may be left without obtaining a signature for delivery.
- Direct Signature
Someone at recipient's address may sign for delivery.
- Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

- No
- Yes
As per attached Shipper's Declaration.
- Yes
Shipper's Declaration not required.
- Dry Ice
Dry Ice, 9, UN 1845 _____ x _____ kg
- Cargo Aircraft Only

7 Payment Bill to:

- Sender
Acct. No. in Section 1 will be billed.
- Recipient
- Third Party
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