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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. 2016-001266

RECEIVED
SEP 27 2018
SC Court of Appeals

Personal Care, Inc.,.....Appellant,

v.

Jerry N. Theos; Uricchio, Howe, Krell,
Johnson, Toporek, Theos & Keith, P.A.;
Cheryl D. Shoun; and Taylor, Shoun,
Bowley & Byrd, LLC, Respondents.

**APPELLANT PERSONAL CARE, INC.’S FIRST MOTION
FOR EXTENSION OF TIME TO FILE APPELLANT’S RETURN TO
RESPONDENTS’ JOINT MOTION FOR LEAVE TO SUPPLEMENT
RECORD ON APPEAL**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF
APPEALS:

Pursuant to Rule 263(b), SCACR, Appellant Personal Care, Inc.
respectfully moves this Court for an extension of time to file Appellant’s

Return to Respondents' Joint Motion for Leave to Supplement the Record on Appeal in the above referenced matter. Appellant's Return is due today, September 27, 2018. Counsel respectfully requests a ten (10) day extension of time. Accordingly, Appellant's Return would be due on October 8, 2018. The grounds for filing this motion are as follows.


Counsel asserts the extension is necessary due to counsel's current caseload and schedule. Further, counsel did not receive Respondents' Joint Motion by United States Mail until September 24, 2018, even though the attached certificate of service states service date is September 17, 2018. This request is to ensure Appellant time to review Respondents' motion and adequately respond to same.

This is counsel's first motion for an extension of time to file Appellant's Return to Respondents' Joint Motion for Leave to Supplement the Record on Appeal. Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By:  _____

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ATTORNEYS FOR APPELLANT

**APPELLANT PERSONAL CARE,
INC.'S FIRST MOTION FOR
EXTENSION OF TIME TO FILE
APPELLANT'S RETURN TO
RESPONDENTS' JOINT MOTION
FOR LEAVE TO SUPPLEMENT
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Columbia, South Carolina
September 27, 2018

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Bowley & Byrd, LLC,..... Respondents.

PROOF OF SERVICE

The undersigned counsel certifies that they served the above referenced Appellant Personal Care, Inc.’s First Motion for Extension of Time to File Appellant’s Return to Respondents’ Joint Motion for Leave to Supplement the Record on Appeal upon all parties by placing a copy in the United States

mail, postage prepaid, to the below listed parties on September 27, 2018,
addressed to the following:

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Christopher Lempesis, Jr., Esquire
Pendarvis Law Offices, P.C.
500 Carteret Street, Suite A
Beaufort, SC 29902-5066

Jennifer H. Thiem, Esquire
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134 Meeting Street, Suite 500
Charleston, SC 294011

**COUNSEL FOR RESPONDENT
CHERYL D. SHOUN**

Oana D. Johnson, Esquire
Oana D. Johnson, Attorney at Law
215 East Bay Street, Suite 406
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**COUNSEL FOR RESPONDENT
TAYLOR, SHOUN, BOWLEY &
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M. Dawes Cooke, Jr., Esquire
Phillip S. Ferderigos, Esquire
Barnwell, Whaley, Patterson
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288 Meeting St., Suite 200
Charleston, SC 29401

**COUNSEL FOR RESPONDENTS
JERRY N. THEOS & URICCHIO,
HOWE, KRELL, JOHNSON,
TOPOREK, THEOS & KEITH,
P.A.**

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By: _____

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ATTORNEYS FOR APPELLANT

**PROOF OF SERVICE- APPELLANT
PERSONAL CARE, INC.'S FIRST
MOTION FOR EXTENSION OF
TIME TO FILE APPELLANT'S
RETURN TO RESPONDENTS'
JOINT MOTION FOR LEAVE TO
SUPPLEMENT RECORD ON
APPEAL**

Columbia, South Carolina
September 27, 2018



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

September 27, 2018

RECEIVED
SEP 27 2018
SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *Personal Care, Inc. v. Jerry N. Theos; Uricchio, Howe, Krell, Johnson, Toporek, Theos & Keith, P.A.; Cheryl D. Shoun; and Taylor, Shoun, Bowley & Byrd, LLC*
Appellate Case No. 2016-001266
C&L File No. 002008-00100

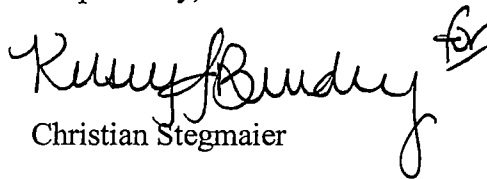
Dear Ms. Kitchings:

Please find enclosed for filing the unbound original and seven (7) copies of Respondents' Motion to for Extension of Time to respond to Respondents' Joint Motion for Leave to Supplement the Record on Appeal in the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the filing fee of same. Please file the original and return a clocked copy of same via our courier.

By copy of this letter and enclosure, we are serving same on counsel of record.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,


Christian Stegmaier

CS/mmm
Enclosures

cc: Thomas A. Pendarvis, Esquire
Christopher Lempeis, Jr., Esquire
Oana D. Johnson, Esquire
Karen E. Spain, Esquire
Jennifer H. Thiem, Esquire
M. Dawes Cooke, Esquire
Phillip S. Ferderigos Esquire