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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity Judge

Case No. 2016-CP-40-00642
Appellate Case No. 2018-001156

RECEIVED
OCT 24 2018
SC Court of Appeals

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.....Respondent.

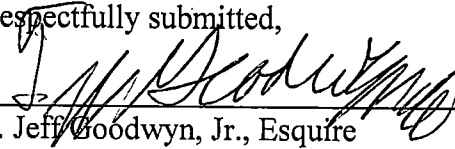
**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file his Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Respondent is currently due on November 1, 2018. If the extension is granted, the Initial Brief of Respondent will be due on December 3, 2018 (as December 1, 2018 is a Saturday). This motion is based on the relative complexity of the issues on appeal that are involved in this case.

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Respectfully submitted,



T. Jeff Goodwyn, Jr., Esquire

SC Bar No.: 73789

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Attorney for Appellant

Columbia, South Carolina

October 23, 2018

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PROOF OF SERVICE

I certify that I have served the **Motion for Extension of Time to File Initial Brief and Designation of Matter**, by depositing a copy of same in the United States Mail, postage prepaid, on **October 23, 2018**, on the following parties, addressed as follows:

Brian P. Robinson, Esquire
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Columbia, SC 29260-1110



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Paralegal to T. Jeff Goodwyn, Jr., Esquire
Goodwyn Law Firm, LLC
2519 Devine Street
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Columbia, South Carolina 29205

October 23, 2018

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
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*Also Licensed in Georgia

October 23, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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RE: *Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co. v. Coogler Construction Company, Inc.*
Appellate Case No.: 2018-001156
Our File No.: 3000-0424

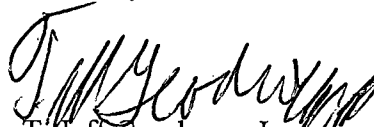
Dear Ms. Kitchings:

This letter is to request a 30 day extension of the deadline to file the Appellant's Initial Brief and Designation of Matter in the above referenced matter. The current due date for this filing is on November 1, 2018.

This is the first request for an extension by the Appellant for this filing. I have also enclosed a check in the amount of \$50.00 for the filing fee. Please return the additional clocked copy of this correspondence in the self-addressed stamped envelope provided.

By copy of this letter to opposing counsel, I am notifying him of this request as well

Sincerely,

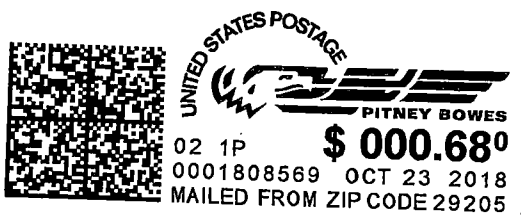
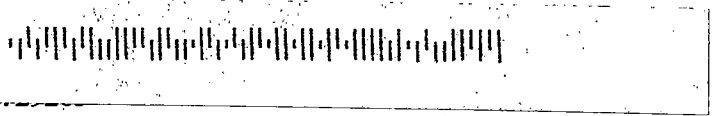

T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Brian P. Robinson, Esquire

Good
2519

Columbia, SC



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The Honorable Jenny Abbott Kitchings
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