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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. 2018-000171

RECEIVED
NOV 08 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 fifth 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.

Prior to filing this motion, counsel attempted to contact opposing counsel but was unsuccessful in doing so.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Moskos", written over a horizontal line.

C. Steven Moskos
SC Bar No. 7938
4000 Faber Place Drive, Ste. 300
Charleston, SC 29405
Telephone: (843) 763-5297
Attorney for Respondent

Charleston, South Carolina
November 5, 2018

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Danny Anderson, and Patrick Bachrodt, Jr.

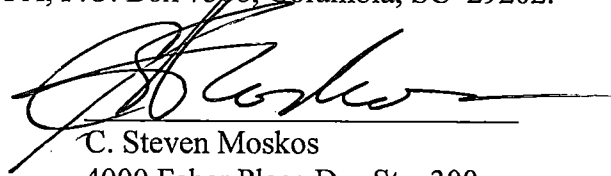
Defendants,

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

Appellants.

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 November 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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csmoskos@earthlink.net

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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November 5, 2018

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

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

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SC Court of Appeals

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 \$50.00 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/csb

Enclosures

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

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North Charleston SC 29405

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SHIP TO: The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia SC 29211-1629



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