

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
The Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

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Case No. 2014-CP-04-2419

**RECEIVED**

NOV 13 2018

SC Court of Appeals

Dr. Marvin Anderson, Respondent.

v.

Mary Thomas, Forest Tomas,  
Prodgal Enterprises, LLC,  
Brushy Creek BarBQ, Inc.,  
And Bail Pros Bail Bonding, LLC, defendants

of whom Mary Thomas is the Appellant,

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**RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO INITIAL BRIEF OF APPELLANT**

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Rodney F. Pillsbury  
301 Rutherford Street  
Greenville, SC 29609  
(864) 241-9828  
Attorney for Respondent

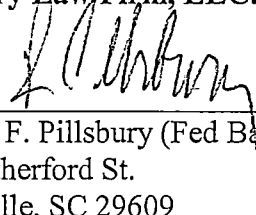
Comes now, Respondent Dr. Marvin Anderson, by and through his undersigned attorney of record, Rodney F. Pillsbury of the Pillsbury Law Firm, does hereby move for an extension of time within which to respond to Appellant's Initial Brief received in my office on October 10, 2018. A post trial motion which involves the issues raised in the appeal took place on August 9, 2017 before the Honorable J. Cordell Maddox.

The transcript of this hearing was not requested by Appellate's counsel. The undersigned requested a transcript of this hearing to be prepared so that it could be included in the Record on Appeal. As of this writing, the transcript for this important hearing has not been received.

Respondent respectfully request an extension of time to permit the inclusion of this hearing into the Record on Appeal. The undersigned counsel will notify the Court as soon as the transcript is received and request thirty (30) days from that date to file Respondent's Initial Brief and Designation of Matters to be included in the Record on Appeal.

Respectfully submitted,

**Pillsbury Law Firm, LLC.**



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Rodney F. Pillsbury (Fed Bar No.: 5963)  
301 Rutherford St.  
Greenville, SC 29609  
Phone: (864) 241-9828  
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November 7, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
The Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

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Case No. 2014-CP-04-2419

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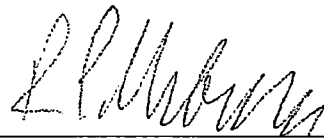
of whom Mary Thomas is the Appellant,

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**PROOF OF SERVICE**

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I certify that I have served Respondent's Motion for Extension of time to respond to the Initial Brief of Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on November 7, 2018 addressed to his attorney of records, W. Patrick Yon, Esq., 2315 North Main Street, Suite 223, Anderson SC 29622.



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Rodney F. Pillsbury  
Pillsbury Law Firm, LLC  
301 Rutherford Street  
Greenville, SC 29609  
(864) 241-9828

November 7, 2018

**RECEIVED**  
NOV 13 2018  
SC Court of Appeals



301 Rutherford Street / Greenville, South Carolina 29609  
Phone: (864) 241-9828 / Fax: (864) 772-3418

November 7, 2018

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

**RECEIVED**  
NOV 13 2018  
SC Court of Appeals

Re: Dr. Marvin Anderson v. Mary Thomas  
Appellat Case No. – 2018-000875

Dear Ms. Kitchings:

I am enclosing for filing the following in the above referenced matter:

1. Respondent's Motion for Extension of Time to Respond to Initial Brief of Appellant;
2. Proof of Service for same.

By copy of this letter to opposing counsel, we are enclosing and serving upon him a copy of the same.

With kind regards,

Very truly yours,

**Pillsbury Law Firm, LLC**

Rodney F. Pillsbury

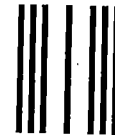
RFP/TPD

Enclosures

cc: W. Patrick Yon, Esq.  
2315 North Main Street, Suite 223  
PO Box 2506  
Anderson, SC 29622

✓

Pillsbury Law Firm, LLC  
301 Rutherford Street  
Greenville, SC 29609

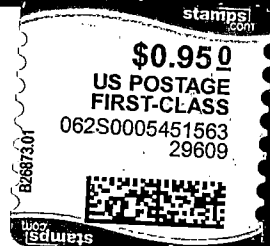


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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
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SC Court of Appeals