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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
In the Court of Common Pleas

DeAndrea Gist Benjamin, Circuit Court Judge

**RECEIVED**

NOV 29 2018

Circuit Case No. 2015-CP-40-7142

SC Court of Appeals

Appellate Case No. 2018-001668

Chad Johnson, Jillian Johnson, and Paul K. Gitzen..... Respondents,

v.

American Residential Services, L.L.C. d/b/a ARS Rescue Rooter..... Appellant.

**APPELLANT'S MOTION FOR ENGLARGEMENT OF TIME TO SERVE AND  
FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant, by and through the undersigned counsel, hereby moves pursuant to Rule 263(b), SCACR, for an order of this Court extending the time to file the Initial Brief and Designation of Matter in the above-captioned appeal. The grounds for this Motion are heavy workload involving depositions and trial preparations for other cases, another appellate brief in a different case to be filed this week, and the Thanksgiving holidays, which prevented preparation of these documents within the time required by Rules 210 and 211, SCACR. This request is the first extension that counsel has sought in this case. This Motion is not made for purposes of undue delay or any other improper purpose.

Therefore, Appellant requests an Order extending the time to file the Initial Brief and Designation of Matter for Thirty (30) days from the date of such Order

and that all timelines be held in abeyance until further Order of this Court.

A handwritten signature in black ink that reads "COBB". The signature is written in a cursive style with a long, sweeping underline that extends to the right, crossing the horizontal line of the typed name below.

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David S. Cobb  
TURNER PADGET  
Post Office Box 22129  
Charleston, South Carolina 29413-2129  
Direct: (843) 576-2803  
Fax: (843) 577-1629  
[dcobb@turnerpadget.com](mailto:dcobb@turnerpadget.com)  
ATTORNEYS FOR APPELLANT

November 27, 2018

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PROOF OF SERVICE

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On November 27, 2018, I mailed a copy of **Appellant's Motion for Enlargement of Time to Serve and File its Initial Brief and Designation of Matter** to:

Richard C. Detwiler  
George A. Taylor  
Post Office Box 1390  
Columbia, South Carolina 29201  
**Attorney for Respondents**



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Heather Hagen

# Turner | Padget

**DAVID S. COBB**

Direct Dial: (843) 576-2803

Direct Fax: (843) 577-1629

[dcobb@turnerpadget.com](mailto:dcobb@turnerpadget.com)

November 27, 2018

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


**RECEIVED**  
NOV 29 2018  
SC Court of Appeals

Re: Chad Johnson v. American Residential  
Appellate Docket No.: 2018-001668  
TP File No.: 1464.7397

Dear Ms. Kitchings:

We enclose the original and seven copies of Appellant's Motion for Enlargement of Time to Serve and File its Initial Brief and Designation of Matter, with attached proof of service. Also enclosed is a check in the amount of \$50.00 for costs associated with filing this motion. Please file the original and return a filed copy to me in the enclosed envelope. If you have any questions or need additional information, please call me at your convenience. With kind regards,

TURNER PADGET



David S. Cobb

DSC/hah  
enclosures

cc: Richard C. Detwiler (with enclosures)  
George Albert Taylor (with enclosures)

**Turner | Padgett**

PO Box 22129, Charleston, SC 29413  
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Jenny Abbott Kitchings  
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**SC Court of Appeals**

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