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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

J. Cordell Maddox, Circuit Court Judge

Case No. 2013-CP-23-05424

RECEIVED
DEC 20 2018
SC Court of Appeals

Shadia Hewitt, Respondent,

v.

The Shaw Corporation d/b/a Shaw's Pharmacy and
Charles Cleburn Turner, Defendants,

of whom The Shaw Corporation d/b/a Shaw's Pharmacy

Is the Appellant.

NOTICE OF MOTION AND MOTION FOR EXTENSION

December 17, 2018

W. Benjamin McClain, Jr., Esquire
(S.C. Bar No. 3740)
W. Benjamin McClain, Jr., L.L.C.
Attorney at Law
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ATTORNEY FOR THE PLAINTIFF, SHADIA
HEWITT

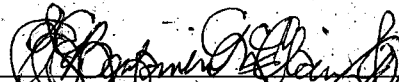
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YOU WILL PLEASE TAKE NOTICE that the undersigned attorney and counsel of record for the Respondent hereby moves for a continuance in which to file and serve the Respondent's Designation Of Matter To Be Included In The Record On Appeal and the Respondent's Initial Brief for the following reasons and upon the following grounds:

- (1.) That the Respondent's original attorney and counsel of record has been disbarred, and the Respondent's present attorney and counsel of record was retained thereafter, and the Respondent's attorney and counsel of record needs more time to more adequately review all of the file materials in this case;
- (2.) That it has been concluded that there is no transcript of testimony in the lower Court, which, upon information and belief, is not needed for the purposes of this appeal;
- (3.) That for weeks, the Respondent's attorney and counsel of record has had a heavy schedule of Court appearances, which have required most of his professional time;
- (4.) That the Respondent's attorney and counsel of record has had several hospitalizations, while the case has been pending, although it has now been determined that he has suffered no residual effects of these hospitalizations;
- (5.) That the Respondent's attorney and counsel of record has had to gather all file materials, pending this appeal.

This Motion is made in the furtherance of justice and is not interposed for the purposes of delay. The attorney and counsel of record for the Appellant has no objection to this extension.

Respectfully submitted,



W. Benjamin McClain, Jr., Esquire

W. Benjamin McClain, Jr., L.L.C.

S.C. Bar No.: 003740

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Is the Appellant.

CERTIFICATE OF SERVICE BY MAIL

I hereby certify that on this date, December 17, 2018, at approximately 1:00 p.m., I served a true and correct copy of the Notice Of Motion And Motion For Extension on the Appellant, The Shaw Corporation d/b/a Shaw's Pharmacy, by mailing it to the Appellant's attorney and counsel of record, by depositing this copy in the U.S. Mail, in an envelope with sufficient postage affixed thereto, U.S. first, (1st), class mail, with sufficient postage affixed thereto, and addressed, as follows:

Respectfully submitted,

SWORN to before me this
17th day of December, 2018
Notary Public for South Carolina

Joseph Sage Daly
Joseph Sage Daly

[Signature]
My Commission expires April 10th, 2026

W. Benjamin Acland, Jr., L.L.C.
Attorney at Law
1700 East Washington Street, Suite J
Greenville, S.C. 29607-1096

GREENVILLE SC 296



To: Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, S.C. 29211

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