

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

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Appellate Case No. 2011-203166

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**RECEIVED**

**JAN 23 2013**

**S.C. Supreme Court**

Team IA, Inc.

Respondent,

v.

Cicero Lucas, George Lawson, IV, and  
5 Point Solutions, LLC,

Defendants,

Of whom Cicero Lucas is

Petitioner,

Cicero Lucas and George Lawson, IV,

Third-Party Plaintiffs,

v.

Brent Yarborough and Team IA, Inc.,

Third-Party Defendants.

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**MOTION FOR EXTENSION TO FILE RESPONDENT'S BRIEF**

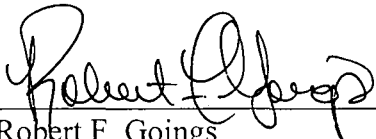
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Respondent Team IA, Inc. hereby moves for a thirty (30) day extension to file and serve Respondent's Brief pursuant to Rule 240 of the South Carolina Appellate Court Rules. This is Respondent's first request for an extension of time.

Due to numerous other work obligations and scheduling conflicts that necessitate this extension request, Respondent needs the additional time to file its Respondent's Brief. Opposing counsel has been contacted and consents to this request. No prejudice will be caused to any party for the relief sought herein. Currently, Respondent's Brief is due on or before February 6,

2013. With the additional thirty (30) day extension, Respondent's Brief would be due on or before March 8, 2013.

Respectfully submitted,

By:   
Robert F. Goings  
GOINGS LAW FIRM, LLC  
Post Office Box 436  
Columbia, South Carolina 29202  
Telephone: (803) 350-9230  
Facsimile: (877) 789-6340

Counsel for Respondent Team IA, Inc.

Columbia, South Carolina

January 23, 2013

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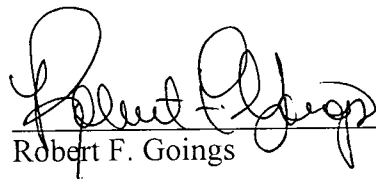
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**PROOF OF SERVICE**

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I certify that I have served the Motion For Extension to File Respondent's Brief by mailing a copy of same, via United States Mail, on January 23, 2013 to the following:

Terry E. Richardson, Jr.  
Daniel S. Haltiwanger  
Christopher J. Moore  
Richardson, Patrick, Westbook & Brickman, LLC  
1730 Jackson Street  
Barnwell, South Carolina 29812  
*Attorney for Petitioner*

  
Robert F. Goings



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E [rgoings@goingslawfirm.com](mailto:rgoings@goingslawfirm.com)

**RECEIVED**

**JAN 23 2013**

**S.C. Supreme Court**

January 22, 2013

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearhouse  
Clerk of the South Carolina Supreme Court  
1231 Gervais Street  
Columbia, SC 29201

Re: Team IA, Inc. v. Cicero Lucas, George Lawson, IV and 5 Point Solutions, LLC  
S.C. Ct. App. Opinion No.: 4889 (October 20, 2011)

Dear Mr. Shearhouse:

Enclosed please find the original and six (6) copies of the Respondent's Motion for Extension to File Respondent's Brief along with the Proof of Service in the above-referenced matter. Please file the original and six copies and return a filed stamped copy to my courier.

By copy of this letter, I am serving a copy of the same to all counsel of record. Please do not hesitate to contact me if you have any questions or concerns.

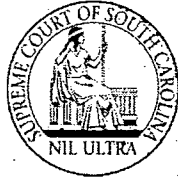
Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Goings", written in a cursive style.

Robert F. Goings

Enclosure

cc: Christopher Moore, Esquire



# The Supreme Court of South Carolina

Goings Law

01/23/2013

## RECEIPT #66976

**Case No:** 2011-203166  
**Case Short Title:** Team IA, Inc. v. Cicero Lucas  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 5311  
**Check/Money Order Date:** 01/22/2013  
**Comments:**