

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge
Kristi Lea Harrington, Circuit Court Judge

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SC Court of Appeals

Appellate Case No. 2017-001563

Cynthia Wright and Richard Wright.....Appellants,

v.

SC Department of Transportation; Pilot Travel
Centers. LLC; Speedway, LLC; Ashley Land
Surveying, Inc. f/k/a Ashley Engineering
and Consulting, Inc.

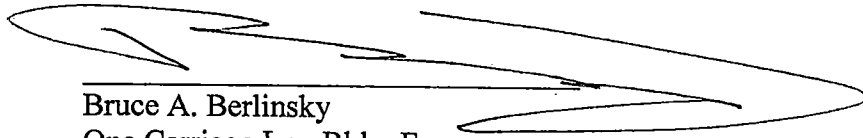
Of Whom

SC Department of Transportation; Pilot Travel
Centers. LLC; Speedway, LLC; Ashley Land
Surveying, Inc. f/k/a Ashley Engineering
and Consulting, Inc.....Respondents.

Motion for Extension of Time to Serve and
File Final Brief

Respondent, Ashley Land Surveying, Inc. f/k/a Ashley Engineering & Consulting, Inc., respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR for an extension of time in which to file and serve its Final Brief which at present was due on December 13, 2018. Counsel for Ashley Land Surveying, Inc. f/k/a Ashley Engineering & Consulting, Inc. seeks additional time for drafting and consultation with the client. This motion is not made for the purpose of undue delay.

I SO MOVE:

A large, stylized handwritten signature in black ink, appearing to read 'Bruce A. Berlinsky', is written over a horizontal line.

Bruce A. Berlinsky
One Carriage Ln., Bldg. F
Charleston, SC 29407
Attorney for Ashley Land Surveying, Inc.

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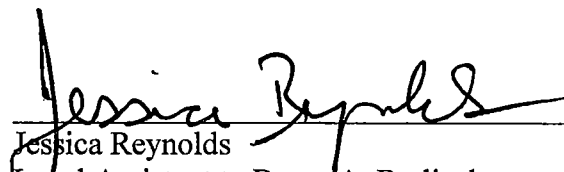
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PROOF OF SERVICE

The undersigned hereby certifies that on this 19th day of December, 2018, she served counsel for the Appellants and counsel of record with a copy of Motion for Extension of Time in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

<p>Kevin B. Smith HOFFMAN LAW FIRM 7087 Rivers Ave. North Charleston, SC 29406</p> <p>S. Randall Hood Jordan C. Calloway MCGOWAN, HOOD & FELDER, LLC 1539 Health Care Drive Rock Hill, SC 29732</p> <p><i>Attorneys for Appellants</i></p>	
<p>Roy G. Maybank, Esq. MAYBANK LAW FIRM 531 Savannah Highway PO Box 12579 Charleston, SC 29422 <i>Attorney for SC DOT</i></p>	<p>J. Bennett Crites, III, Esq. Mary B. Ramsay, Esq. SHUMAKER, LOOP & KENDRICK, LLP PO Box 22207 Charleston, SC 29413 <i>Attorneys for Speedway, LLC</i></p>
<p>William G. Besley, Esq. Jeffrey I. Silverberg HOWER, NEWMAN, & BESLEY, LLC 1508 Washington Street PO Box 12009 Columbia, SC 29211 <i>Attorneys for Pilot Travel Centers, LLC</i></p>	


 Jessica Reynolds
 Legal Assistant to Bruce A. Berlinsky
 Bruce A. Berlinsky, P.A.

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BRUCE A. BERLINSKY, P.A.
Attorney at Law

Mailing Address:
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Charleston, SC 29402

One Carriage Lane, Building F
Charleston, SC 29407

Office: (843) 852-2202
Fax: (843) 852-4844
Bruce@berlinskylawfirm.com

December 19, 2018

VIA FED EX

SC Court of Appeals
Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate St.
Columbia, SC 29201

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Re: Cynthia Wright and Richard Wright v. SCDOT, et al.
Appellate Case No.: 2017-001563

Dear Clerk Kitchings:

In connection with the above referenced matter, enclosed please find the following:

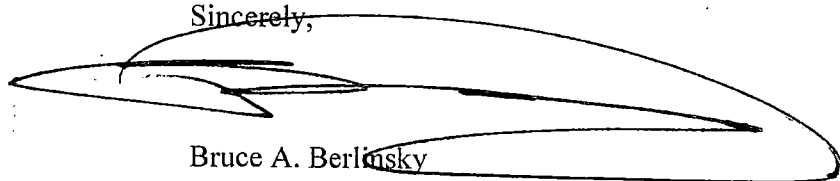
1. Original and 15 copies of Motion for Extension
2. Original and 15 copies of Respondent, Ashley Land Surveying, Inc.'s Final Brief
3. Proof of Service of Motion for Extension
4. Proof of Service of Respondent, Ashley Land Surveying, Inc.'s Initial Brief
5. Check in the amount of \$25.00 for Motion fee

Please return the filed copies to us in the enclosed, postage-paid envelope. By copy of this letter, I am serving copies of the foregoing on opposing counsel.

If you need anything further, please do not hesitate to contact me.

With kind regards, I am

Sincerely,



Bruce A. Berlinsky

BAB/jlr
Enclosures

CC: Kevin B. Smith, Esquire
S. Randall Hood, Esquire
Roy G. Maybank, Esquire
J. Bennett Crites, III, Esquire
William G. Besley, Esquire

✓

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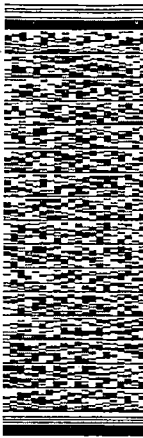
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