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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 04 2019
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2015-CP-10-3325, 2017-CP-10-05055
Appellate Case No. 2018-001413

Phillip DeClemente, a/k/a Alex Rochford, Appellant,

v.

Assistive Technology Medical Equipment
Services, LLC; Jeffrey Reed; Murrell G. Smith, Respondents,

and

Phillip DeClemente, a/k/a Phillip Goodpaster, Appellant,

v.

Assistive Technology Medical Equipment
Services, LLC (ATMES); Jeffrey Reed; Murrell G. Smith, Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, respondents request a 30-day extension of the
deadline for filing their initial brief and designation of matter to be included in the record on
appeal. The current deadline is January 7, 2019. This is the second request for an extension
of this deadline.

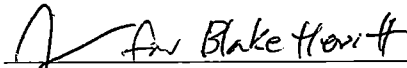
/Signature page attached

✓

January 4, 2019

Respectfully submitted,

Sc BAR #77587

A handwritten signature in black ink, appearing to read "Blake A. Hewitt", written over a horizontal line.

Blake A. Hewitt # 73674

BLUESTEIN THOMPSON SULLIVAN, LLC

PO Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondents

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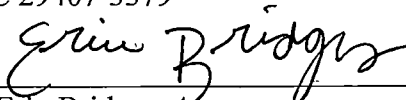
v.

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Appellant with a copy of the *Motion for Extension* by mailing copies of
the same by United States Mail with first class postage prepaid to the following address:

Cameron L. Marshall
7 Gamecock Ave, Ste 707
Charleston, SC 29407-3379


Erin Bridges

January 4, 2019

January 4, 2019

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

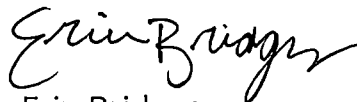
Re: Phillip DeClemente v. Assistive Technology Medical
Case Tracking No. 2018-001413

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have enclosed a proof of service of this document on counsel for the Appellant and a \$50.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges
Paralegal to Blake A. Hewitt
Bluestein Thompson Sullivan, LLC

/emb

Enclosures

cc: James E. Smith, Jr., Esquire
Cameron L. Marshall, Esquire