

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity Judge

Case No. 2016-CP-40-00642
Appellate Case No. 2018-001156

RECEIVED
JAN 18 2019
SC Court of Appeals

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

v.

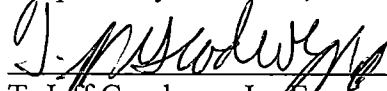
Coogler Construction Company, Inc.....Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RECORD ON APPEAL

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file the Record on Appeal. The Record on Appeal is currently due on January 18, 2019. If the extension is granted, the Record on Appeal will be due on February 18, 2019 (as February 17, 2019 is a Saturday). This motion is based on a delay in obtaining the trial exhibits from the Master-in-Equity Court as they were kept in the Court's possession after the Trial. Appellant has requested the documents, but have not received them as of the date of this filing.

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Respectfully submitted,



T. Jeff Goodwyn, Jr., Esquire

SC Bar No.: 73789

Goodwyn Law Firm, LLC

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jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina

January 17, 2019

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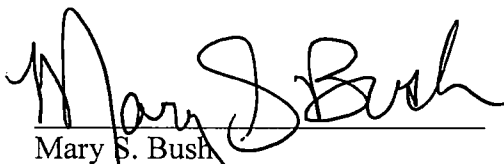
v.

Coogler Construction Company, Inc.....Respondent.

PROOF OF SERVICE

I certify that I have served the **Motion for Extension of Time to File the Record on Appeal**, by depositing a copy of same in the United States Mail, postage prepaid, on **January 17, 2019**, on the following parties, addressed as follows:

Brian P. Robinson, Esquire
Bruner, Powell, Wall & Mullins, LLC
P.O. Box 61110
Columbia, SC 29260-1110



Mary S. Bush
Paralegal to T. Jeff Goodwyn, Jr., Esquire
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, South Carolina 29205

January 17, 2019

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
C. David Beale, Jr.*

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*Also Licensed in Georgia

January 17, 2019

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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JAN 18 2019
SC Court of Appeals

RE: *Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co. v. Coogler Construction Company, Inc.*
Appellate Case No.: 2018-001156
Our File No.: 3000-0424

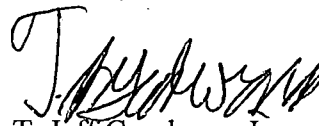
Dear Ms. Kitchings:

This letter is to request a 30 day extension of the deadline to file the **Record on Appeal** in the above referenced matter. The current due date for this filing is on January 18, 2019.

This is the first request for an extension by the Appellant for this filing. I have also enclosed a check in the amount of \$50.00 for the filing fee. Please return the additional clocked copy of this correspondence in the self-addressed stamped envelope provided.

By copy of this letter to opposing counsel, I am notifying him of this request as well

Sincerely,


T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Brian P. Robinson, Esquire

✓

Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, S.C. 29205

FIRST-CLASS



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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
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