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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JAN 31 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**

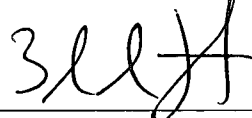
Pursuant to Rule 240, SCACR, respondents request a 30-day extension of the deadline for filing their initial brief and designation of matter to be included in the record on appeal. The current deadline is February 6, 2019. This is the third request for an extension of this deadline.

This third extension was not anticipated and it will be the final extension request. The lawyer with chief responsibility for preparing the respondents' brief has had to devote

an unusually large amount of time over the last three weeks to other professional obligations. This time would otherwise have been spent on this case and on other appellate cases. Again, this will be the final extension request.

January 31, 2019

Respectfully submitted,



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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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**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 31, 2019

January 31, 2019

VIA HAND DELIVERY

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

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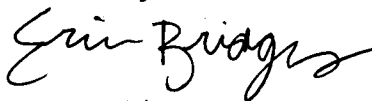
Re: Phillip DeClemente v. Assistive Technology Medical  
Case Tracking No. 2018-001413

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