

IN THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM Horry COUNTY
Court Of Common Pleas

Larry B. Hyman, Circuit Court Judge

RECEIVED
FEB 01 2019
SC Court of Appeals

Case No.: 2015-CP-26-05633
Appellate Case No.: 2018-001497

Bobby Foster, Appellant,

vs.

Julian Neil Armstrong, Respondent.

**MOTION FOR A 30 DAY EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL
BRIEF AND DESIGNATION OF MATTER ON APPEAL**

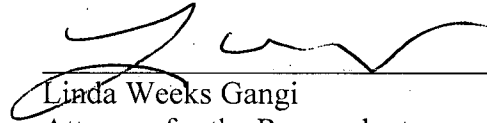
The Respondent's undersigned counsel hereby moves before the Court for a thirty (30) day extension of time in which to file the Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal. No previous extension has been requested. The basis for this motion is that the undersigned was out of the office on a family vacation during the week of January 7, 2019. Upon returning to the office, the undersigned had a number of mediations and depositions scheduled. The undersigned has not had sufficient time to properly prepare Respondent's Initial Brief and Designation of Matter and hereby requests an additional thirty (30) days to prepare and file same. The Respondent's Initial Brief and Designation of Matter on Appeal

are due on February 1, 2019. This extension, if granted, would make these submissions due on March 3, 2019.

Conway, South Carolina

THOMPSON & HENRY, P.A.

January 30, 2019



Linda Weeks Gangi
Attorney for the Respondent
PO Box 1740
Conway, SC 29528-1740
(843) 248-5741 (p)
lgangi@thompsonlaw.com
SC Bar No.: 2365

IN THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM HORRY COUNTY
Court Of Common Pleas

Larry B. Hyman, Circuit Court Judge

Case No.: 2015-CP-26-05633
Appellate Case No.: 2018-001497

RECEIVED

FEB 01 2019

SC Court of Appeals

Bobby Foster, Appellant,

vs.

Julian Neil Armstrong, Respondent.

CERTIFICATE OF SERVICE

I, Neicey Smith, certify that I have served the **Motion for a 30 Day Extension of Time to file Respondent's Initial Brief and Designation of Matter on Appeal** on Bobby Foster by depositing a copy of it in the United States Mail, postage prepaid, as well as via email on January 30, 2019, addressed to their attorneys of record as follows:

teamjefferies@googlegroups.com
lane@akimlawfirm.com
Lane D. Jefferies, Esquire
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29403
Attorney for the Appellant

Neicey Smith

Neicey Smith

Legal Assistant to

Linda Weeks Gangi, Esquire

THOMPSON & HENRY, P.A.

PO Box 1740

Conway, SC 29528-1740

neicey@thompsonlaw.com

THOMPSON & HENRY, P.A.
ATTORNEYS AT LAW
1300 SECOND AVENUE, THIRD FLOOR (29526)
POST OFFICE BOX 1740
CONWAY, SOUTH CAROLINA 29528

LINDA WEEKS GANGI
lgangi@thompsonlaw.com

TELEPHONE
(843) 248-5741
FAX
(843) 248-5112

January 30, 2019

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

RE: *Bobby Foster vs. Julian Neil Armstrong*
Appellate Case No.: 2018-000706
Civil Action No.: 2015-CP-26-5633
Date of Loss: April 8, 2013
Claim No.: 40-2K34-502
SF Insured: Deloria G. Armstrong

RECEIVED

FEB 01 2019

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed herewith the original and six (6) copies of the Motion for Extension of Time to file Respondent's Initial Brief and Designation of Matter on Appeal in the above matter along with the filing fee and a Certificate of Service for same. By copy of this letter, I am serving Appellant's counsel with a copy of said Motion.

If you have any questions with regard to this, please do not hesitate to contact me.

With kindest personal regards, I remain

Yours very truly,

THOMPSON & HENRY, P.A.



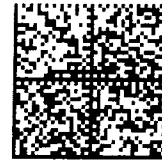
Linda Weeks Gangi

LWG/ns

Enclosures

cc: Lane D. Jefferies, Esquire
SF 5612.06

THOMPSON & HENRY, P.A.
ATTORNEYS AT LAW
POST OFFICE BOX 1740
CONWAY, SOUTH CAROLINA 29528



U.S. POSTAGE» PITNEY BOWES



ZIP 29526 \$ 001.75⁰
02 4W
0000361320 JAN. 30. 2019

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