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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA ADMINISTRATIVE LAW COURT

The Honorable S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2018-001613
Case No. 18-ALF-17-0216-CC

RECEIVED
FEB 11 2019
SC Court of Appeals
Appellant.

Ex Parte: Representative Chip Huggins,Appellant.

In re: WKSC, LLC d/b/a
Savannah's Gentlemen's Club & Steakhouse,.....Petitioner, Respondent,


v.

South Carolina Department of Revenue,Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

The undersigned, as counsel for the Petitioner, Respondent hereby moves this Court for a Ten (10) day extension of time to file its Initial Brief. This motion is made on the grounds that Attorney John C. Bradley, Jr. is preparing this brief. Mr. Bradley unexpectedly underwent surgery last week for a medical condition which will require additional treatment. As such, Mr. Bradley has been out of the office under a physician's care. This is the first request for an extension in this matter. By the undersigned's calculations the extension, if granted, would extend Petitioner, Respondent's deadline for filing their Initial Brief to February 27, 2019.

WHEREFORE, Petitioner, Respondent above named, respectfully request that this Court issue its Order to extend the deadline for the service and filing of its Initial Brief for an additional Ten (10) days making Petitioner, Respondent's Initial Brief due on or before February 27, 2019.



S. Jahue Moore, SC Bar #4063
MOORE TAYLOR LAW FIRM, P.A.
Post Office Box 5709
West Columbia, SC 29171
(803) 796-9160
ATTORNEY FOR PETITIONER,
RESPONDENT

West Columbia, South Carolina
February 11, 2019

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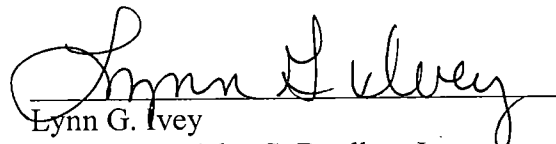
PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Initial Brief on the Appellant and Respondent by depositing a copy of them in the United States Mail, postage prepaid, on February 11, 2019, addressed to Appellant and Respondent's counsel as follows:

Jason P. Luther, Esquire
Patrick A. McCabe, Esquire
South Carolina Department of Revenue
PO Box 12265
Columbia, SC 29211-9979

Andrew Richardson, Jr., Esquire
J. Adam Ribock, Esquire
McAngus Goudelock & Courie, LLC
PO Box 12519, Capital Station
Columbia, SC 29211-2519

February 11, 2019


Lynn G. Ivey
Assistant to John C. Bradley, Jr.

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Sheila McNair Robinson
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Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Justin Thomas Williams

Robert D. Hazel
RETIRED
Billy C. Coleman
RETIRED

February 11, 2019

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

RECEIVED
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SC Court of Appeals

VIA HAND DELIVERY

Re: Ex Parte: Representative Chip Huggins (WKSC, LLC v. SCDOR)
Appellate Case No. 2018-001613

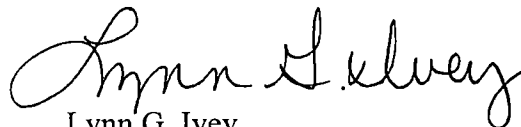
Dear Ms. Kitchings:

Enclosed for filing with your office are the original and three copies of Petitioner, Respondent's Motion for Extension of Time to File Initial Brief and Proof of Service in this matter. Please have the extra copies clocked in and returned to us via our courier.

By copy of this letter, I am serving Appellant and Respondent's counsel with the Motion for Extension.

Thank you for your assistance with this filing.

Sincerely,



Lynn G. Ivey
Assistant to John C. Bradley, Jr.

Enclosures

cc: Jason P. Luther, Esquire
Patrick A. McCabe, Esquire
Andrew Richardson, Jr., Esquire
J. Adam Ribock, Esquire
Kenneth E. Allen, Esquire

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