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**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas**

The Honorable Letitia H. Verdin, Circuit Court Judge

RECEIVED
FEB 13 2019
SC Court of Appeals

Appellate Case No. 2018-001885

Glenn P. Howell..... Appellant,

v.

Covalent Chemical, LLC and Matthew W. Rowe..... Respondents.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Respondents, Covalent Chemical, LLC and Matthew W. Rowe, by and through their undersigned attorneys, respectfully move this Court for an Order granting them leave to serve and file their initial brief outside the filing deadline set by Rule 208 of the South Carolina Appellate Court Rules. In support of this motion, Respondents state and respectfully show the following:

1. Under the applicable SCACR, including SCACR 208, the filing deadline for Respondent's Initial Response Brief is February 25, 2019.
2. Respondents' attorney is currently working on preparing an initial appellate brief in a complex business matter which is the result of a week-

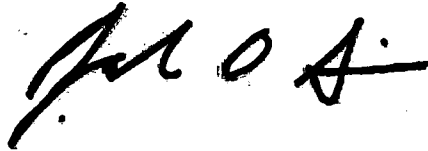
long trial and consolidation of three separate appeals. (*See* Appellate Ca. No. 2018-001444). The initial brief and designation of matters in that case is due on or before February 27, 2019.

3. Due to the aforementioned appeal deadlines, Respondents respectfully request an extension for the filing of their Initial Brief and Designation of Matter in this case.
4. Respondents have received consent from opposing counsel for Howell (Appellant) for an additional thirty (30) days for the filing of Initial Brief and Designation of Matter.
5. This is Respondents' first request for an extension of time.
6. For these reasons, the Respondents are requesting the time to file their Initial Brief and Designation of Matter be extended by thirty (30) days.

(signature page to follow)

Respectfully Submitted,

ROE CASSIDY COATES & PRICE, P.A.



Joseph O. Smith (S.C. Bar No. 77475)

Ross B. Plyler (S.C. Bar No. 71688)

1052 N. Church St.

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Attorneys for Respondents

February 11, 2019

Greenville, South Carolina

Other Counsel of Record:

David E. Rothstein, Esq.

Rothstein Law Firm, P.A.

1312 Augusta Street

Greenville, SC 29605

Attorney for Appellant

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PROOF OF SERVICE

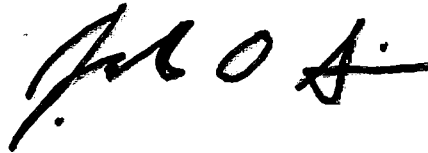
I certify that I have served the Motion for Extension of Time to File Initial Brief on the above-named Appellant by depositing a copy of it in the United States Mail, postage prepaid, on February 11, 2019, addressed to counsel of record as follows.

David E. Rothstein, Esq.
Rothstein Law Firm, P.A.
1312 Augusta Street
Greenville, SC 29605
Attorney for Appellant

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Respectfully Submitted,

ROE CASSIDY COATES & PRICE, P.A.

A handwritten signature in black ink, appearing to read "J O S", with a horizontal line drawn through the middle of the letters.

Joseph O. Smith (S.C. Bar No. 77475)

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February 11, 2019

Greenville, South Carolina



**Roe Cassidy
Coates & Price PA**

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February 11, 2019

VIA U.S. MAIL

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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SC Court of Appeals

**Re: Glenn P. Howell v. Covalent Chemical, LLC and Matthew W. Rowe
Appellate Case No. 2018-001885
RCCP No. 3060.0001A**

Dear Madam Clerk:

Please find the original Motion for Extension of Time to File Initial Brief and six copies of same. I have also enclosed the Proof of Service on Appellants and a \$50.00 check to cover the cost of the filing fee.

We appreciate the Court's time and consideration of this request. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

ROE CASSIDY COATES & PRICE PA

Joseph O. Smith

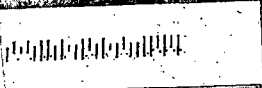
JOS/ads

cc: David E. Rothstein, Esq.

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**Honorable Jenny A. Kitchings
Clerk of Court
S.C. Court of Appeals
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RCCP No. 3060.0001

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