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MAR 11 2019

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY,
Circuit Court
The Honorable Daniel D. Hall, Circuit Court Judge

Case No. 2015-CP-10-4166
Appellate Case No. 2018-001125

Theodore Wagner,

Appellant,

versus

Designa Print and Mike Davis including anyone who is Complicit or
Enabled protecting Mike Davis,

Respondent.

MOTION FOR EXTENSTION OF TIME

v

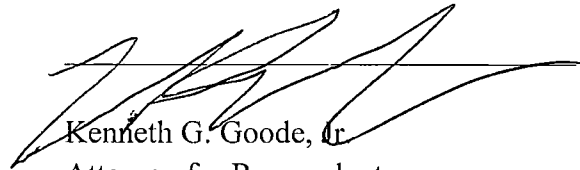
Pursuant to Federal Rule of Civil Procedure 6(b), Respondent, Mike Davis, by and through their undersigned counsel, respectfully moves this Court for an order extending the time within which they may respond to Appellant's Amended Motion for Late Filing until May 1, 2019. In support of this motion, the Respondent states as follows:

Rule 6(b) gives the Court discretion to grant a motion to extend a deadline for good cause before the deadline expires. The deadline to file a responsive pleading has not yet expired. There is good cause to grant Respondent's motion. This unopposed motion will enable Respondent to assemble necessary information to provide its response to Appellant's Amended Motion for Late Filing, is in good faith, and is not interposed for any delay or prejudice. The granting of this motion will not prejudice any of the parties to this action.

WHEREFORE, the Respondent respectfully requests that the Court enter an order granting an extension to respond to Appellant's Amended Motion for Late Filing until May 1, 2019.

Respectfully Submitted,

LAW OFFICE OF KENNETH G. GOODE, JR., LLC.



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Charleston, South Carolina
March 7, 2019

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SC Court of Appeals

March 7, 2019

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

RE: Theodore Wagner v. Designa Print and Mike Davis Including Anyone who is
Complicit or Enabled Protecting Mike Davis
Case No.: 2015-CP-10-4166
Appellate Case No.: 2018-001125

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Respondent's Motion for Extension of Time as to the above referenced case. Thank you in advance for returning the "filed"-stamped copy to me in the enclosed self-addressed envelope.

Sincerely,

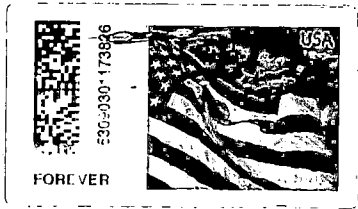


Wanda E. Bradley
Legal Assistant

web
w/enclosures

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SC Court of Appeals

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

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