

THE STATE OF SOUTH CAROLINA
In the 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

RECEIVED
MAR 15 2019
SC Court of Appeals

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, Appellant requests a 20-day extension of the deadline for filing his reply brief. The current deadline is March 18, 2019. Counsel is currently pressed for time due to deadlines in federal criminal and civil actions pending in the United States District Court, Charleston Division.

/Signature page attached

March 14, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cameron L. Marshall". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cameron L. Marshall, – S.C. Bar #64192
7 Gamecock Avenue, Ste. 707
Charleston, South Carolina 29407
Telephone: (843) 795- 2298
cameron@attorneymarshall.com
Attorney for the Appellant

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PROOF OF SERVICE

I certify that I have served Appellant's Motion for Extension of Time on Assistive Technology Medical Equipment Service, LLC, by mailing same via U.S. Mail with proper postage attached on March 14, 2019, addressed to attorneys of record, James E. Smith, 1422 Laurel Street, Columbia, South Carolina, 29201 and Blake Hewitt, PO Box 7965, Columbia, SC 29202.

March 14, 2019

/signature page attached



Cameron L. Marshall, – S.C. Bar #64192

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Charleston, South Carolina 29407

Telephone: (843) 795- 2298

cameron@attorneymarshall.com

Attorney for Appellant



March 14, 2019

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

IN RE: Phillip DeClemente, Appellant, v. Assistive Technology Medical
Equipment Services, LLC, Respondent
Case Tracking No. 2018-001413

Dear Ms. Kitchings:

Please find enclosed for filing:

- (1) The original and seven (7) copies of a *Motion for Extension* in reference to the above matter;
- (2) Proof of Service on Respondent's attorneys;
- (3) A filing fee of \$50.00 for filing this motion.

Please file the enclosed documents and return copies to me in the enclosed self-addressed envelope.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

Cameron L. Marshall

CLM/kf

Enclosures as stated

cc: James E. Smith, Jr., P. A. Blake Hewitt
1422 Laurel Street P.O. Box 7965
Columbia, SC 29201 Columbia, SC 29202

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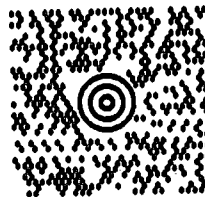
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