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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge  
Larry B. Hyman, Jr., Circuit Court Judge

**RECEIVED**  
MAR 19 2019  
SC Court of Appeals

Appellate Case No. 2018-001497  
Civil Action No. 2015-CP-26-05633

Bobby Foster,..... Appellant,

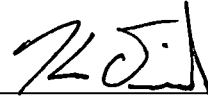
v.

Julian Neil Armstrong,..... Respondent,

**APPELLANT’S MOTION FOR 14 DAY EXTENSION  
TO FILE APPELLANT’S REPLY BRIEF**

Appellant Bobby Foster respectfully requests a 14-day extension in which to file a Reply Brief on the following grounds. Respondent was granted an extension to file his Initial Brief and Designation of Matter. As a result, Appellant timely received Respondent’s Initial Brief the afternoon of March 5, 2019 – just three business days before Appellant’s counsel was set to begin trial in Federal Court on another matter. One of those three days was consumed by jury selection in the federal case. The remainder were consumed with trial preparation. Trial lasted for two days (ending the afternoon of March 12, 2019). Accordingly, Appellant hereby respectfully requests a modest extension of 14 days in order to review Respondent’s Initial Brief

and to draft and file a Reply Brief. With a 14-day extension of time, the Reply Brief would be due on Friday, March 29, 2019.



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Eric M. Poulin  
S.C. Bar No.: 100209  
Roy T. Willey, IV  
S.C. Bar No.: 101010  
Lane D. Jefferies  
S.C. Bar No.: 101764  
Kenneth T. David  
S.C. Bar No.: 103434  
Anastopoulo Law Firm, LLC  
32 Ann Street  
Charleston, SC 29403  
(843) 614-8888

**Attorneys for Appellant**

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Bobby Foster, ..... Appellant,

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Julian Neil Armstrong, ..... Respondent,

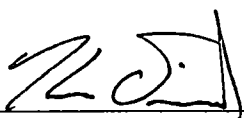
**PROOF OF SERVICE**

I, the undersigned employee of Anastopoulo Law Firm, LLC, do hereby certify that I have caused the below referenced documents to be served Via U.S. Mail, postage prepaid, to all parties of record at the address shown below:

Appellant's Motion for 14 Day Extension to  
File Reply Brief to Respondent's Initial Brief

Linda Weeks Gangi  
Thompson & Henry, PA  
PO Box 1740  
Conway, SC 29528

March 15, 2019

  
\_\_\_\_\_  
Kenneth T. David, Esq.  
Attorney

TOLL FREE: 1 (800) 313-2546  
FACSIMILE: (843) 494-5536

REPLY TO ANN STREET OFFICE  
KENNETH@AKIMLAWFIRM.COM

# ANASTOPOULO

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## LAW FIRM

AKIM A. ANASTOPOULO (SC)  
ERIC M. POULIN (SC)(NC)(GA)(CA)  
ROY T. WILLEY, IV (SC)

JONATHAN N. ALKIS (SC)  
CONSTANCE ANASTOPOULO (SC)\*  
GUS ANASTOPOULO (SC)  
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P. HEATH WARD (SC)  
DANNY LEE WILLARD, JR. (SC)  
L. CRAYTON WILLIAMS (SC)

March 15, 2019

**Sent Via U.S. Mail**

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

RE: Bobby Foster v. Julian Neil Armstrong  
Appellate Case No.: 2018-0001497

Dear Ms. Kitchings:

**RECEIVED**

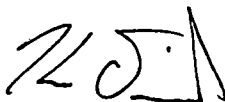
MAR 19 2019

SC Court of Appeals

Enclosed for filing with your office is Appellant Bobby Foster's Motion for a 14 day extension in which to file Appellant's Reply Brief to Respondent's Initial Brief. I have enclosed a \$50.00 check for the filing fee of this Motion.

By copy of this letter and the enclosed proof of service, I am providing a copy of this extension request on counsel for Respondent.

Sincerely,



Kenneth T. David, Esq.

Enclosures as stated

cc: Linda Weeks Gangi (Sent Via U.S. Mail)

\*OF COUNSEL

**MAILING: 32 Ann Street, Charleston, South Carolina 29403**

**North Charleston:** 2170 Ashley Phosphate Road, 3<sup>rd</sup> Floor, North Charleston, South Carolina 29406 \* **Greenville:** 418 River Street, Greenville, SC 29601

**Florence:** 150 W. Evans Street, Florence, South Carolina 29501 \* **Myrtle Beach:** 2411 N. Oak Street, Suite 407, Myrtle Beach, South Carolina 29577

**Columbia:** 1201 Main Street, Suite 1100, Columbia, South Carolina 29201 \* **Raleigh, NC:** 8801 Fast Park Drive, Suite 301, Raleigh, NC 27617

**Wilmington, NC:** Appointment Only



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Charleston, SC 29403

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