

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Administrative Law Court
The Honorable Deborah Brooks Durden, Administrative Law Judge

RECEIVED
MAR 29 2019
SC Court of Appeals

Appellate Case No. 2018-001788

Toyota of Greer Appellant,

v.

South Carolina Department of Motor Vehicles Respondent.

**MOTION FOR ENLARGEMENT OF TIME TO FILE
RESPONSE TO APPELLANT'S RETURN TO MOTION TO EXCLUDE
2016 DEALER MANUAL FROM RECORD**

Pursuant to Rule 224, SCACR, the Respondent South Carolina Department of Motor Vehicles (SCDMV) requests an enlargement the deadline for filing the Response to Appellant's Return to the Department's Motion to Exclude 2016 Dealer Manual from the Record. The current deadline is March 25, 2019 and the Response was not filed due to a calendaring error. This is Respondent SCDMV's first request for an extension of this deadline. Counsel for the Appellant has consented to this extension.

Respectfully submitted,



FRANK L. VALENTA, JR., SC Bar # 5682

General Counsel

PHILIP S. PORTER, SC Bar # 4526

Deputy General Counsel

BRANDY A. DUNCAN, SC Bar # 72052

Assistant General Counsel

South Carolina Department of Motor Vehicles

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Counsel for the Appellant SCDMV

March 27, 2019

Blythewood, South Carolina

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PROOF OF SERVICE

PURSUANT TO SCACR, I HEREBY CERTIFY that today, March 27, 2019, I served one (1) copy of the Respondent South Carolina Department of Motor Vehicles' Motion for Enlargement of Time to File Response to Appellant's Return to Motion to Exclude 2016 Dealer Manual from Record by depositing with the United States Postal Service, correct postage prepaid, to Counsel for the Appellant at the address indicated below:

Bradford N. Martin, Esquire
P.O. Box 10410
Greenville, South Carolina 29603


Jeannine (Nina) Moore, Paralegal
Office of General Counsel

March 27, 2019
Blythewood, South Carolina

Henry McMaster
Governor



Kevin A. Shwedo
Director

State of South Carolina
Department of Motor Vehicles

March 27, 2019

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

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RE: *Toyota of Greer v. South Carolina Department of Motor Vehicles*
Appellate Case No: 2018-001788

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced action, please find the original and seven (7) copies of Respondent South Carolina Department of Motor Vehicles' Motion for Enlargement of Time to File Response to Appellant's Return to Motion to Exclude 2016 Dealer Manual from Record. As evidenced by the attached Certificate of Service, I am serving the parties with a copy of same. Please file the original and return a copy to me with an affixed clerk's date of filing in the enclosed self-addressed stamped envelope.

Thank you for your cooperation in this matter.

In kind regards,


Jeannine (Nina) Moore, Paralegal
Office of General Counsel

Enclosures

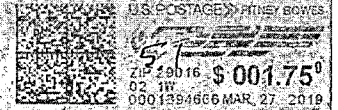
cc: Bradford N. Martin, Esquire



South Carolina Department of Motor Vehicles

Post Office Box 1498
Blythewood, South Carolina 29016

MV-17



South Carolina Department of Motor Vehicles

P.O. Box 1498
Blythewood, S.C. 29016

Form 103

Forwarding Service Requested

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