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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In the Court of Common Pleas for the Ninth Circuit

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2018-001158

Curtis MillsRespondent

v.

The South Carolina State Ports AuthorityAppellant

CONSENT MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
APPELLANT'S INITIAL REPLY BRIEF AND DESIGNATION OF
MATTER FOR INCLUSION IN THE RECORD ON APPEAL

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*Counsel for Appellant South Carolina State
Ports Authority*

Other Counsel of Record:

Ladson F. Howell, Jr., Esq.
Howell & Christmas, LLC
PO Box 1896
Mount Pleasant, SC 29465
Counsel for Respondent Curtis Mills



AND NOW COMES Appellant The South Carolina State Ports Authority ("SPA") and files the following Consent Motion for Extension of Time to Serve and File Appellant's Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal:

1. Respondent served his Initial Brief of Respondent and Designation of Matter to be included in the Record of (sic) Appeal on March 25, 2019.

2. As a result, pursuant to S.C.R.A.P., Rule 208(a)(3), SPA's Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal are due on April 4, 2019.

3. In order to have time to sufficiently prepare his initial Reply Brief, Appellant SPA respectfully requests a fifteen (15) day extension to serve and file its Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal.

4. With the extension, Appellant SPA's Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal would be due on April 19, 2019.

5. Respondent SPA has not previously requested an extension of time to serve and file its Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal.

6. Counsel for Respondent has graciously consented to the extension requested herein.

THEREFORE, for the foregoing reasons, Appellant The South Carolina State Ports Authority respectfully requests that this Court grant the instant Consent Motion for Extension of Time and extend the time for Appellant to serve and file its Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal until **April 19, 2019.**

April 1, 2019

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By: 

Randell C. Stoney, Esq.

John W. Fletcher, Esq.

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***Counsel for Appellant South Carolina State
Ports Authority***

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Kristi Lea Harrington, Circuit Court Judge **SC Court of Appeals**

Appellate Case No. 2018-001158

Curtis MillsRespondent

v.

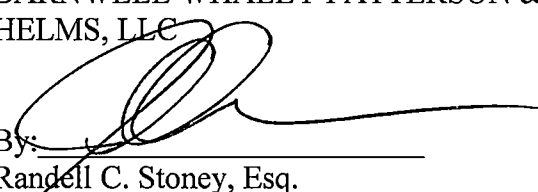
The South Carolina State Ports AuthorityAppellant

PROOF OF SERVICE

I certify that I have served the Appellant The South Carolina State Ports Authority's Consent Motion for Extension of Time to Serve and File Initial Appellant's Brief and Designation of Matter for Inclusion in the Record on Appeal on the above-referenced Respondent by depositing a copy of it in the United States Mail, postage prepaid, on April 1, 2019, addressed to his attorneys of record:

Ladson F. Howell, Jr., Esq.
Howell & Christmas, LLC
PO Box 1896
Mount Pleasant, SC 29465
Attorneys for Respondent Curtis Mills

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By: 
Randell C. Stoney, Esq.
John W. Fletcher, Esq.
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*Counsel for Appellant South Carolina State
Ports Authority*



Randell Stoney, Jr., Esquire
Rstoney@barnwell-whaley.com

April 1, 2019

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VIA FEDERAL EXPRESS

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

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SC Court of Appeals

Re: Curtis Mills v. South Carolina State Ports Authority
Appellate Case No. 2018-001158

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of a Consent Motion for Extension of Time to Serve and File Appellant's Initial Brief and Designation of Matter for Inclusion in the Record on Appeal in the above matter, along with the original and one (1) copy of a Proof of Service. Also enclosed is our firm's check in the amount of \$25.00 for the filing fee. Upon filing, please return a clocked copy of each to me in the envelope enclosed for your convenience.

By copy of this letter we are serving a copy of the Motion upon counsel for the Respondent.

Sincerely,

Randell C. Stoney, Jr.
John W. Fletcher

RCSjr/JWF/jgc
Enclosures

cc: Ladson Howell, Jr., Esquire (via U.S. Mail and E-mail)
Randolph R. Lowell, Esq. (via E-mail only)
R. Walker Humphrey, Esq. (via E-mail only)

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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 Company **SC COURT OF APPEALS**
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