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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

D. Reece Williams, III, Special Referee

RECEIVED

APR 30 2019

SC Court of Appeals

Case No. 2018-CP-40-03590

Appellate Case No. 2019-000662

Keon MitchellAppellant,

v.

Bridgette Keeley.....Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant, Keon Mitchell, by and through his undersigned attorneys, respectfully moves this Court for an Order granting them leave to serve and file their initial brief outside the filing deadline set by Rule 208 of the South Carolina Appellate Court Rules. In support of this motion, Appellant states and respectfully shows the following:

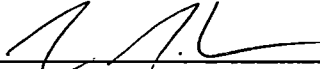
1. Under the applicable SCACR, including SCACR 208, the filing deadline for Appellant's Initial Brief is May 17, 2019.
2. Due to the various issues regarding damages and types of recovery sought that were heard on February 22, 2019 before the Honorable D. Reese Williams, III, there are separate transcripts for the issues during the February 22, 2019 hearing. Appellants both requested and received electronic copies of the hearing transcripts from the court

reporter on April 17, 2019; causing the deadline for filing of Appellant's Initial Brief to be May 17, 2019.

3. Appellant has received consent from opposing counsel for Keeley (Respondent) for an additional thirty (30) days for the filing of Initial Brief and Designation of Matter.
4. This is Appellant's first request for an extension of time.
5. For these reasons, the Appellant is requesting the time to file their Initial Brief and Designation of Matter be extended by thirty (30) days.

(signature page to follow)

ROE CASSIDY COATES & PRICE, P.A.



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Greenville, SC 29601
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Fax: (864) 349-0303
jhudson@roecassidy.com
Attorneys for Appellant

April 25, 2019
Greenville, South Carolina

Other Counsel of Record:

Robert F. Goings, Esq.
The Goings Law Firm
P.O. Box 436
Columbia, SC 29202
Attorney for Respondent

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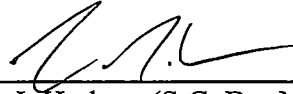
PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to File Initial Brief on the above-named Respondent by depositing a copy of it in the United States Mail, postage prepaid, on April 25, 2019, addressed to counsel of record as follows.

Robert F. Goings, Esq.
Goings Law Firm, LLC
P.O. Box 436
Columbia, SC, 29202
Attorneys for Respondent

(Signature page follows)

ROE CASSIDY COATES & PRICE, P.A.



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Attorneys for Appellant

April 25, 2019
Greenville, South Carolina



**Roe Cassidy
Coates & Price PA**

JOSHUA J. HUDSON
DIRECT DIAL: 864.349.2606
EMAIL: JHUDSON@ROECASSIDY.COM
LICENSED IN SC AND KY

April 25, 2019

VIA USPS

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

RECEIVED

APR 30 2019

SC Court of Appeals

Re: Bridgette Keeley v. Keon Mitchell
Appellate Case No. 2019-000662
RCCP No. 2566.0179

Dear Madam Clerk:

Enclosed for filing, please find the original Motion for Extension of Time to File Initial Brief and six copies of same in the above-referenced case. Please file the Motion and return a filed stamped copy to us in the self-addressed, stamped envelope provided herein. Also, enclosed please find the Proof of Service on Respondent and a \$50.00 check to cover the cost of the filing fee.

Please allow this letter to serve as notice that we are in receipt of the hearing transcripts as of April 17, 2019, which establishes the deadline for the initial brief and designation of matter to be included in the record on appeal as May 17, 2019. We are requesting an additional thirty (30) days which would make the new deadline June 17, 2019.

In response to your letter dated April 24, 2019, a copy of which we pulled from the Court's online record, enclosed please find a copy of the Notice of Appeal filed with Richland County's Court of Common Pleas.

By copy of this correspondence, we are serving counsel for the Respondent with a copy of the same.

1052 North Church Street Greenville SC 29601	PO Box 10529, Greenville SC 29603	p 864 349 2600 f 864 349 0303
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We appreciate the Court's time and consideration of this request. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

ROE CASSIDY COATES & PRICE PA

A handwritten signature in black ink, appearing to read "J. Hudson", written over the printed name below.

Joshua J. Hudson, Esq,

JJH/ads

Enclosures (*as stated*)

CC: Robert Goings, Esq.
Jessica Gooding, Esq.

NEOPOST FIRST-CLASS MAIL

04/25/2019
US POSTAGE \$002.05⁰



ZIP 29601
041M11278298



**Roe Cassidy
Coates & Price PA**

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**Hon. Jenny Abbott Kitchings
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