

96665

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Robin B. Stilwell, Circuit Judge

RECEIVED
JUN 20 2019
SC Court of Appeals

Appellate Case No. 2019-000070

Richard A. Gorman,.....Appellant,

v.

John C. Monarch; Direct Outbound Services, LLC; ShipChain, Inc.;
Aaron Kelly; Sami Rusani; and Brian Evans,.....Respondents.

MOTION FOR EXTENSION OUT OF TIME TO SERVE AND FILE
APPELLANT’S INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Appellant hereby moves pursuant to Rule 263(b), SCACR, for an extension out of time, to July 10, 2019, of the time in which to serve and file Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

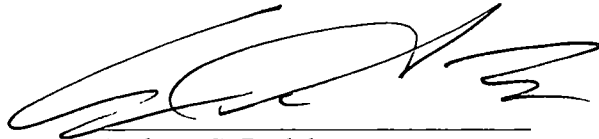
1. The undersigned made an error. He did not serve and file Appellant’s initial brief and designation on time.
2. The undersigned incorrectly calendared the deadline to do so as July 10, 2019, when it was actually June 10, 2019.
3. Accordingly, Appellant seeks an extension of this deadline to July 10, 2019. This extra time is needed because, in addition to a very full court schedule and writing deadlines to meet in trial-level cases,

Appellant's counsel has briefs in three other appeals that need to be completed between now and then.

4. This is the second extension that Appellant has sought in this appeal.
5. This appeal is not very old, and the extension sought would not prejudice the Respondent.
6. Appellant's counsel believes there is good cause to grant the requested extension of this deadline to July 10, 2019.

WHEREFORE Appellant prays for an order extending the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal to July 10, 2019.

Respectfully submitted,



Andrew S. Radeker
S.C. Bar No. 73743
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

June 20, 2019

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Robin B. Stilwell, Circuit Judge

Appellate Case No. 2019-000070

RECEIVED
JUN 20 2019
SC Court of Appeals

Richard A. Gorman,.....Appellant,

v.

John C. Monarch; Direct Outbound Services, LLC; ShipChain, Inc.;
Aaron Kelly; Sami Rusani; and Brian Evans,.....Respondents.

PROOF OF SERVICE

I certify that I served the foregoing motion for extension in this case by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

G. Doc Morgan, Esq.
McAngus Goude-lock & Courie, LLC
P.O. Box 2980
Greenville, SC 29602

Christopher T. Brumback, Esq.
Spencer D. Langley, Esq.
Brumback & Langley, LLC
1 Augusta St., Suite 301
Greenville, SC 29601

Steve A. Matthews, Esq.
Haynsworth Sinkler Boyd, P.A.
P.O. Box 11889
Columbia, SC 29211-1889

Elizabeth L. Bakker, Esq.
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
Greenville, SC 29602

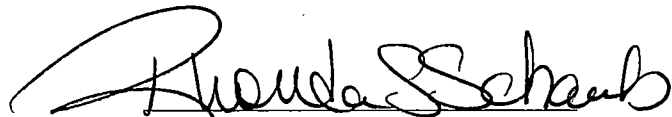
Thomas W. Traxler, Esq.
Carter, Smith, Merriam, Rogers & Traxler, P.A.
P.O. Box 10828
Greenville, SC 29603

Kurt M. Rozelsky, Esq.
Wheeler Trigg O'Donnell LLP
101 Marietta St.
Atlanta, GA 30303

George G. Robertson, Esq.
Charles Jeremiah, Esq.
Jason Huebinger, Esq.
David E. Taylor, Esq.
1100 Louisiana St., Suite 4300
Houston, TX 77002-5227

June 20, 2019

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rhonda S. Schaub". The signature is fluid and cursive, with a large initial "R" and "S".

Rhonda S. Schaub
Paralegal
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant