

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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JUN 21 2019

APPEAL FROM STATE OF SOUTH CAROLINA  
Administrative Law Court

SC Court of Appeals  
90085

Deborah Brooks Durden, S.C. Administrative Law Court Judge

Appellate Case No. 2019-000898

Docket No. 19-ALJ-22-0004-AP

Eastwood Construction, LLC,..... Appellant,

v.

South Carolina Department of Employment and Workforce  
and Timothy Kern,..... Respondents.

**MOTION FOR EXTENSION OF TIME**

The undersigned, as counsel for the Appellant hereby moves for a thirty (30) day extension of time to file its Initial Brief and Designation of Matter. These documents are currently due on or before June 29, 2019.

Appellant’s counsel wishes to have additional time in order to prepare Appellant’s Brief due to his current pressing caseload. Counsel has been out of state due to leading a Boy Scout Troop on an extended backpacking trip in New Mexico. This is counsel’s first request for an extension. Further, there would be no prejudice to the parties by an extension of time. Accordingly, counsel respectfully moves for a thirty-day extension in which to file the Appellant’s initial brief and designation of matter. By the undersigned’s

calculations the extension, if granted, would extend Appellant's deadline for filing its Initial Brief and Designation of Matter to July 29, 2019.

Respectfully submitted,



June 19, 2019

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James Edward Bradley, SC Bar #66130  
Moore Taylor Law Firm, P.A.  
P.O. Box 5709  
West Columbia, SC 29171  
(803) 796-9160  
Attorney for Appellant Eastwood  
Construction, LLC

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**PROOF OF SERVICE**

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I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have served the Motion for an Extension on Respondents by depositing a copy of same in the United States Mail, postage prepaid, on June 19, 2019, addressed as follows:

Jacqueline Pavlicek, Esquire  
PO Box 1929  
Columbia, SC 29202

Benjamin Cook, Esquire  
Office of General Counsel  
SC Department of Employment  
and Workforce  
PO Box 8597  
Columbia, SC 29202

  
Lynn Gilvey

West Columbia, South Carolina

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**JUN 21 2019**

**SC Court of Appeals**

June 19, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Eastwood Construction, LLC v. South Carolina Department of Employment and  
Workforce and Timothy Kern  
Appellate Case No. 2019-000898

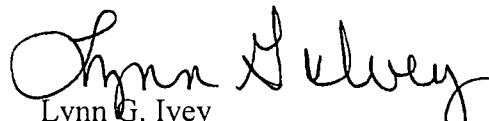
Dear Ms. Kitchings:

Enclosed for filing with your office are the original and three copies of Appellant Eastwood Construction, LLC's Motion for an Extension and Proof of Service in this matter. Also enclosed is our firm check for \$50.00. Please have the extra copies clocked in and returned to us in the envelope provided.

By copy of this letter, I am serving Respondents' counsel with the Motion for an Extension.

Thank you for your assistance with this filing.

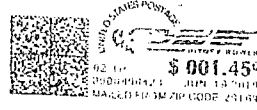
Sincerely,

  
Lynn G. Ivey  
Assistant to James Edward Bradley

Enclosures

cc: Jacqueline Pavlicek, Esquire (via first class mail)  
Benjamin Cook, Esquire (via first class mail)

S. Jahue Moore†  
J. Mark Taylor\*  
C. Vance Stricklin, Jr.  
James Edward Bradley†  
Sheila McNair Robinson  
Christian G. Spradley  
William H. Edwards  
Stanley L. Myers  
Jane H. Downey\*  
S. Jahue Moore, Jr.  
John C. Bradley, Jr.  
Melissa K. Moore  
William B. Fortino  
Ralph Nichols Riley, Jr.  
Amber Cary Fulmer  
Lester McGill Bell, Jr.  
Bryan C. Letteer  
Edward Hood Dawson  
-----  
Robert D. Hazel†  
C. David Sawyer, Jr.†  
Billy C. Coleman  
1916-2019



**First Class Mail**

**MOORE | TAYLOR**  
LAW FIRM

PO Box 5709, West Columbia SC 29171  
1700 Sunset Boulevard, West Columbia SC 29169

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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