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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Doyet Early, III

RECEIVED
OCT 21 2019
SC Court of Appeals

Trial Court Case 2016-CP-40-00100

Hills Machinery Respondent
Company, LLC

v.

Jackson Development..... Appellants.
Group, LLC and J. Elliott Summey

MOTION FOR EXTENSION OF TIME

Appellants request that the Court allow an additional 10 days to file their Initial Brief in this matter. Two previous extensions of this deadline were made and granted. Counsel for Appellants is currently under a heavy schedule of hearings, jury trials and mediation during the month of October. In addition, a client I represent made a complaint against a defendant in an ongoing litigation, against the express wishes of her counsel, necessitating a 3 hour meeting with ODC on Monday October 14, 2019. In addition, the complaint required an extensive document review and retrieval during the week of October 14, 2019. Due to these unexpected obligations, Counsel will be unable to complete the Initial Brief by October 18, 2019. If this extension is granted, the new deadline for service and filing of the Reply Brief will be October 28, 2019. No party will be prejudiced by this extension of time and it is not requested for purposes of harassment or delay. All counsel agree and consent to this extension of time for all initial briefs to be due. Counsel asserts he does not anticipate seeking any additional extensions for the initial briefs.

October 17, 2019

Tucker S. Player
Player Law Firm, LLC
P.O. Box 21005
Columbia, SC 29221
803-772-8008
Attorney for Appellants

Other Counsel of Record:
Baron Stanton, Esq.
Stanton Law Firm
PO Box 245
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Proof of Service

This is to certify that I, Elvy Diaz, have served the foregoing Motion for Extension of Time
via U.S. Mail with sufficient postage affixed, addressed as follows:

Baron Stanton, Esq.
Stanton Law Firm
PO Box 245
Columbia, SC 29202


Elvy Diaz

October 17, 2019
Columbia, South Carolina



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SC Court of Appeals

South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

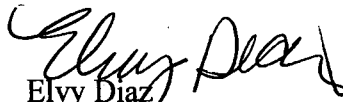
**RE: Hills Machinery Company, LLC v. Jackson Development, LLC and
J. Elliott Summey
Trial Court Case No.: 2016-CP-40-00100
Our File No.: CIV-749-01
Appellate Case No.: 2019-000623**

To whom it may concern:

Please find enclosed an original and eight copies of Appellants Motion for Extension of Time in the above referenced matter. I have also enclosed our firm's check in the amount of \$50.00 for the filing fee. Please return a filed copy to our office in the envelope I have enclosed.

By copy of this letter, we are serving a copy of the motion on opposing counsel. If you have any questions or concerns, please contact our office at the number provided below. Thank you for your assistance with this matter.

Kind regards,


Elvy Diaz
Legal Secretary

Enclosure(s) as stated

Cc: Baron Stanton, Esq. (w/enclosure)

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