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STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APPEAL FOR THE LEXINGTON COUNTY  
Court of Common Pleas

OCT 24 2019

SC Court of Appeals

R. Keith Kelly, Circuit Court Judge  
Circuit Court Case No. 2018-CP-32-1854

Appellate Case No.: 2019-001181

Twin Bridge Logistics, LLC n/k/a Twin Bridge Transport, LLC, ..... Appellant

v:

Fisher Tank Company f/k/a Fisher Tank Company, Inc. ....: Respondent

Motion for Extension of Time

The undersigned counsel for the Respondent respectfully moves the court for a 30 day extension of time to serve and file the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal which is currently due on October 30, 2019.

With the extension and the Thanksgiving Day holiday, the Respondent's initial brief and designation would be due on December 2, 2019.

The undersigned has consulted with counsel for the Appellant prior to making this motion and Appellant counsel has indicated that he has no objection to the motion and will consent to the relief requested. The motion for extension is made prior to the date to the expiration of the filing deadline for which the extension is sought. The Respondent has not previously requested

an extension of time in this matter.

This request is made on the grounds that the additional time is needed by the undersigned counsel for the Respondent due to previously scheduled depositions, mediation and pending deadlines in other matters.

Respectfully submitted

Gertz & Moore, LLP

By: 

W. Joseph Moore, Jr.  
S.C. Bar No 10236  
1416 Laurel Street (29201)  
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Columbia, SC 29202-0456  
(803) 252-1524  
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Attorneys for the Respondent

October ~~22~~, 2019

Other Counsel of Record:  
William H. Edwards  
Moore Taylor Law Firm  
1700 Sunset Boulevard  
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[will@mttlaw.com](mailto:will@mttlaw.com)  
Attorney for the Appellant.

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Certificate of Service

The undersigned, attorney for Respondent, hereby certifies, that on this 22nd day of October, 2019, I served the Respondent's Motion for an Extension of Time on counsel of record in this matter, by depositing a copy of same in the United States Mail, with sufficient first class postage affixed thereto, and addressed as follows:

William H. Edwards, Esquire  
Moore Taylor Law Firm  
P.O. Box 5709  
West Columbia, SC 29171

October 22, 2019

  
W. Joseph Moore, Jr. SC Bar No.: 10236  
Attorney for the Respondent

**Gertz & Moore, LLP**  
**Attorneys & Counselors at Law**  
**1416 Laurel Street (29201)**  
**Post Office Box 456**  
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Frederick A. Gertz  
(S.C., N.Y. & Ga)  
W. Joseph Moore, Jr.

Of Counsel:  
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Alice S. Moore  
1946 - 2012

October 22, 2019

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

RE: Twin Bridge Logistics, LLC v. Fisher Tank Company  
Appellate Case No. 2019-001181  
Motion for Extension

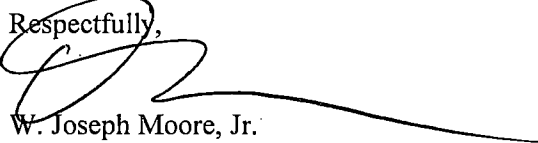
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Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of the Motion for Extension of Time of the Respondent and Certificate of Service in the above referenced matter. I have also enclosed our firm's check in the amount of Fifty and No/100 (\$50.00) dollars for the motion fee.

Please do not hesitate to contact my office if you have any questions or require any additional information to file the enclosed.

Respectfully,

  
W. Joseph Moore, Jr.  
Attorney for the Respondent

cc: William H. Edwards, Esquire

