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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from York County
Court of Common Pleas
Jean H. Toal, Circuit Court Judge

Appellate Case No. 2019-000649
Circuit Court Case No. 2013-CP-46-00368

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DEC 03 2019
SC Court of Appeals

Stephen R. Edwards, Individually and as Personal Representative of the Estate of Steven Redfearn Stewart, Respondent,

v.

Scapa Waycross, Inc., Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF OF APPELLANT SCAPA WAYCROSS, INC.**

William P. Early, Esquire
Joseph C. Wilson, IV, Esquire
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Attorneys for Appellant Scapa Waycross, Inc.

NOW COMES Appellant Scapa Waycross, Inc. ("Scapa"), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby moves this Honorable Court for an extension of thirty (30) days' time to file their Reply Brief in this matter.

Appellant received the Respondent's Brief in this matter on November 15, 2019. Rule 208(a)(3), SCACR, provides that Appellant shall file and serve its Reply Brief within ten (10) days after receiving the transcript. Thus, Appellant's Reply Brief is currently due on November 25, 2019.

Due to the Thanksgiving holiday and work-related and other time commitments and also due to the complexity of this products liability matter, which was tried before a jury, the undersigned counsel for Appellant requests the Court's allowance of thirty (30) days' additional time to file and serve the Appellant's Reply Brief.

Respondent has consented in writing to the request for a thirty (30) day extension of time to file and serve Appellant's Reply Brief.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

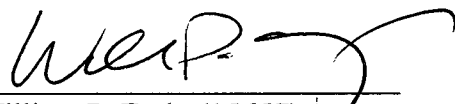
WHEREFORE, this Appellant requests that the Court grant an extension of thirty (30) days' time (running from November 25, 2019) to file its Reply Brief. By the undersigned's calculations, if this request is granted, the new deadline to file the Reply Brief would be December 26, 2019.

ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, this Appellant requests that the Court hold the present deadline for filing

the Reply Brief in abeyance until the Court acts on this motion.

**PIERCE SLOAN WILSON KENNEDY & EARLY
LLC**

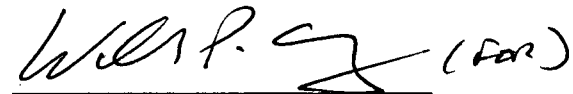
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BY: 
William P. Early (15657)

Dec. 2, 2019
Charleston, South Carolina

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Dec. 2, 2019
Atlanta, Georgia

Attorneys for Appellant Scapa Waycross, Inc.

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PROOF OF SERVICE

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Attorneys for Appellant Scapa Waycross, Inc.

I, William P. Early, Esq. of Pierce Sloan Wilson Kennedy & Early, LLC counsel for Appellant Scapa Waycross, Inc., hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF ON BEHALF OF APPELLANT SCAPA WAYCROSS, INC.** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on December 2, 2019 properly posted for delivery to the following addresses:

Greg Hyland, Esquire
Hart, Hyland, Shepherd, LLC
207 East 1st North Street
Summerville, SC 29483

Frederick Jekel, Esquire
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1512 Laurel Street
PO Box 2597
Columbia, SC 29201

William Graham, Esquire
WALLACE & GRAHAM, P.A.
525 North Main St.
Salisbury, NC 28144

Attorneys for Respondent

Respectfully submitted,
Pierce Sloan Wilson Kennedy & Early LLC

By: _____

William P. Early (SC Bar No. 7326)
Joseph C. Wilson, IV (SC Bar No. 63002)
Attorneys for Appellant Scapa Waycross, Inc.

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● MEMBER SC & TN BAR

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CARSON R. PARKER
KATIE L. MILLER
DANIEL F. LYNCH, IV

■ MEMBER SC & VA BAR

December 2, 2019

VIA FED-EX

Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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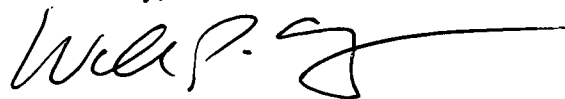
Re: Stephen R. Edwards v. Scapa Waycross, Inc.
Appellate Case No.: 2019-000649
Our File No: 2708246903

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellant Scapa Waycross, Inc.'s Motion for Extension of Time to File Reply Brief and one (1) copy of the Proof of Service of same. Please file the originals and return court-stamped copies of each to me in the enclosed envelope.

With kind regards,

Sincerely,



William P. Early

WPE/ret
Enclosure

cc: Gregory L. Hyland, Esquire (via US Mail and email)
Frederick J. Jekel, Esquire (via US Mail and email)
William M. Graham, Esquire (via US Mail and email)

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