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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Benjamin H. Culbertson, Circuit Court Judge

RECEIVED
DEC 11 2019
SC Court of Appeals

Appellate Case No. 2019-001286

Lower Court Case No. 2017-CP-26-08184

Jane Doe.....Appellant,

v.

Crazy Horse Saloon & Restaurant, Inc. d/b/a
Thee New Dollhouse and Dog Leg Right, LLCRespondent.

**MOTION FOR AN EXTENSION TO FILE INITIAL
BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

Pursuant to Rule 263(b), SCACR, Respondent Crazy Horse Saloon & Restaurant, Inc. d/b/a Thee New Dollhouse and Dog Leg Right, LLC, by and through the undersigned attorneys, respectfully requests a 30-day extension of the deadline to file its Initial Brief of Respondent and Designation of Matter with the Court in the above-captioned appeal. This is Respondent's first request for an extension of the deadline. Although the undersigned counsel attempted to confer with opposing counsel prior to filing this motion, counsel was in trial and Respondent needed to move forward with requesting the extension given the pending deadline.

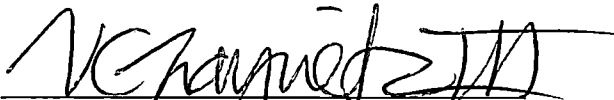
The basis for this request is that the undersigned counsel were just recently retained to handle the appeal of this matter and require additional time to review the record, properly research the issues, and prepare a brief. Further, given the deficiency letters and corrections involving

Appellant, Respondent is unclear as to the exact date on which the 30-day clock began running to file an Initial Brief of Respondent and Designation of Matter. Upon information and belief, the current deadline is December 18, 2019. If this motion is granted, the new deadline would be January 17, 2020.

For the foregoing reasons, counsel for Respondent respectfully request that the Court grant this motion for a 30-day extension to file the Initial Brief of Respondent and Designation of Matter for good cause shown and in the interests of justice.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

Vordman Carlisle Traywick, III
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Attorneys for Respondent Crazy Horse Saloon & Restaurant, Inc. d/b/a Thee New Dollhouse and Dog Leg Right, LLC

Columbia, South Carolina
December 11, 2019

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Jane Doe.....Appellant,

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**PROOF OF SERVICE OF MOTION FOR AN EXTENSION TO FILE INITIAL
BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

I, the undersigned, of the law offices of Robinson Gray Stepp & Laffitte, LLC, attorneys for Respondent, do hereby certify that I have served counsel in this action with a copy of the Motion for an Extension to File Initial Brief of Respondent and Designation of Matter by mailing a copy of same to counsel via United States Mail, postage prepaid, at the following address(es):

Counsel Served:

William J. Luse, Esquire
SC Bar No.: 72790
916 Broadway Street
Myrtle Beach, SC 29577

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

Vordman Carlisle Traywick, III

SC Bar No. 102123

Benjamin R. Gooding

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*Attorneys for Respondent Crazy Horse Saloon &
Restaurant, Inc. d/b/a Thee New Dollhouse and
Dog Leg Right, LLC*

Columbia, South Carolina

December 11, 2019



**ROBINSON
GRAY**

Litigation + Business

December 11, 2019

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VIA HAND DELIVERY

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DEC 11 2019
SC Court of Appeals

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

RE: Jane Doe v. Crazy Horse Saloon & Restaurant, Inc. d/b/a
Thee New Dollhouse and Dog Leg Right, LLC
SC Court of Appeals Case No. 2019-001286
Our File No. 7509-1500

Dear Ms. Kitchings:

I enclose for filing the originals and one copy of a Notice of Appearance of me and Benjamin R. Gooding as counsel for Respondent and a Motion for Extension of Time to File Brief of Respondent and Designation of Matter in the above-reference matter. I have also enclosed our firm's check in the amount of \$50.00 in payment of the filing fee. Please return clocked-in copies of same to me for my file.

By copy of this letter I am serving a copy of these documents upon counsel for the Appellant, William J. Luse, Esquire. If you have any questions or need further information, please don't hesitate to give me a call. Thank you for your consideration. With highest regards, I am,

Very truly yours,

Vordman Carlisle Traywick, III

VCT:rco
Enclosures

cc: William J. Luse, Esquire
William Monckton, VI, Esquire