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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
DEC 23 2019
SC Court of Appeals

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2019-001689

Bettis C. Rainsford,.....Appellant,

v.

Apex Bank, Jim Clayton, Matt Daniels, and Brad Hailey,.....Defendants,

Of which, Matt Daniels and Brad Hailey are.....Respondents.

MOTION FOR FIRST EXTENSION OF TIME

The Appellant hereby moves for an Order granting an extension of time to file and serve the Initial Appellant’s Brief and the Designation of Matter to be Included in the Record on Appeal. The current deadline for filing and serving those materials is January 9, 2020. The Appellant requests an extension of thirty (30) days, which would create a new due date of February 10, 2020. The Appellant bases this motion on the following grounds:

1. The Appellant will be out of the state and unable to assist counsel with preparing the brief and designation of matter until January 16, 2020.
2. Counsel for the Appellant also has vacation days between now and the current due date because of the holidays. In addition, the two holiday-shortened weeks account for almost half of the original 30-day period for preparing these materials.

3. This is the first requested extension for the Initial Appellant's Brief and the Designation of Matter.

4. Granting the requested extension will not prejudice the Respondents in any way.

5. The undersigned counsel for the Appellant consulted with counsel for the Respondents regarding this request via email on December 11, 2019. Counsel did not receive a final response until earlier today (December 23, 2019), when he was informed that the Respondents would not consent to the request.

6. Nevertheless, the Appellant respectfully asserts that good cause exists for granting this first extension request.

Therefore, the Appellant requests that the Court grant this motion and set February 10, 2020 as the new due date for the Initial Appellant's Brief and the Designation of Matter to be Included in the Record on Appeal. The Appellant further requests that the Court hold the current deadline in abeyance pending its consideration and decision of this motion.

Respectfully submitted,



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Attorneys for the Appellant

December 23, 2019

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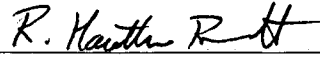
PROOF OF SERVICE

The undersigned, an attorney in this matter for the Appellant, certifies that I have this
23rd day of December, 2019, served copies of the **Motion for First Extension of Time** upon all
other counsel of record by causing them to be deposited in the United States mail with sufficient
postage, addressed to:

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December 23, 2019

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December 23, 2019

Via Hand Delivery

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

RECEIVED
DEC 23 2019
SC Court of Appeals

Re: Bettis C. Rainsford v. Apex Bank, Inc., et al.
Appellate Case No. 2109-001689
Our File No. 14919.00101

Dear Ms. Kitchings:

Enclosed are the following materials: (1) the original and seven copies of the Appellant's Motion for First Extension of Time, (2) the original and one copy of the Proof of Service, and (3) a check for the filing fee. Please file the originals and necessary copies and return the stamped extra copies to our courier. Thank you for your kind assistance.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.



R. Hawthorne Barrett

RHB
Enclosures

cc: James H. Cassidy, Esq.
Joshua J. Hudon, Esq.
Ross B. Plyler, Esq.

Turner | Padget

Hon. Jenny Abbott Kitchings
December 23, 2019
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H. Freeman Belser, Esq.
Michael J. Polk, Esq.