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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
JAN 14 2020
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.

**CONSENT MOTION FOR A SECOND 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 14-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 second request for an extension of the deadline. The undersigned counsel consulted with opposing counsel prior to filing this motion, and Appellant consents to the extension.

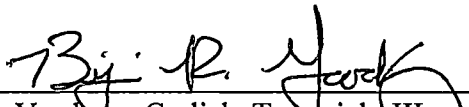
The basis for this request is that the undersigned counsel, who were retained in December 2019 to assist with the appeal, just recently received the transcripts of the hearings in the proceedings below over the holidays and require additional time to review the record, properly research the issues, and prepare a brief in this matter. The current deadline is January 17, 2020.

If this motion is granted, the new deadline would be January 31, 2020. Respondent does not intend to request any additional extensions of this deadline.

For the foregoing reasons, counsel for Respondent respectfully request that the Court grant this motion for a second 14-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: 

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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
January 14, 2020

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Jane Doe.....Appellant,

v.

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

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

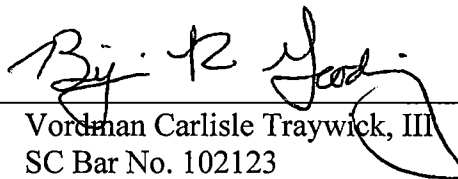
I, the undersigned, of the law offices of Robinson Gray Stepp & Laffitte, LLC, attorneys for Respondent, do hereby certify that I have served counsel in this action with a copy of the Consent Motion for a Second Extension to File Initial Brief of Respondent and Designation of Matter by mailing a copy 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:  _____

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*Attorneys for Respondent Crazy Horse Saloon &
Restaurant, Inc. d/b/a Thee New Dollhouse and
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Columbia, South Carolina

January 14, 2020



**ROBINSON
GRAY**

Litigation + Business

January 14, 2020

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VIA HAND DELIVERY

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

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JAN 14 2020
SC Court of Appeals

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 original and one copy of a Consent Motion for a Second Extension of Time to File Initial 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 a clocked-in copy of same to me for my file.

By copy of this letter I am serving a copy of same 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
Enclosure

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