

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Michael L. Nettles, Circuit Court Judge

RECEIVED
JAN 15 2020
SC Court of Appeals

Appellate Case No. 2019-001370

Walt Parker Appellant,

v.

John C. Curl Respondent,

v.

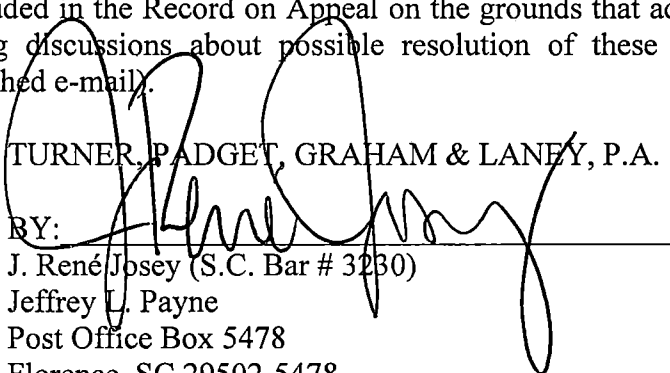
Palmetto Floor Covering Installation, LLC,
and Florence Custom Countertops, Inc., Third-Party Defendants.

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

The Respondent hereby moves for a second thirty (30) day extension of time to file their Initial Brief and Designation of Matter to Be Included in the Record on Appeal on the grounds that additional time would facilitate the parties' ongoing discussions about possible resolution of these matters. Appellant consents to this request (see Attached e-mail).

Florence, South Carolina
January 13, 2020

TURNER, PADGET, GRAHAM & LANEY, P.A.

BY: 
J. René Josey (S.C. Bar # 3230)
Jeffrey L. Payne
Post Office Box 5478
Florence, SC 29502-5478
(843) 656-4451
RJosey@TurnerPadget.com (Email)
ATTORNEYS FOR RESPONDENT

Other Counsel of Record:
William Reynolds Williams, Esquire

Josey, J. Rene

To: Josey, J. Rene
Subject: FW: extension gratned.

From: Reynolds Williams [<mailto:Reynolds@willcoxlaw.com>]
Sent: Monday, January 13, 2020 2:24 PM
To: Payne, Jeff L.
Subject: RE: FCT debt to FCC

Yes to the extension.

From: Payne, Jeff L. <JPayne@TurnerPadget.com>
Sent: Monday, January 13, 2020 2:20 PM
To: Reynolds Williams <Reynolds@willcoxlaw.com>
Subject: RE: FCT debt to FCC

Reynolds can we get an extension on the reply brief?

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Michael L. Nettles, Circuit Court Judge

RECEIVED
JAN 15 2020
SC Court of Appeals

Appellate Case No. 2019-001370

Walt Parker Appellant,

v.

John C. Curl Respondent,

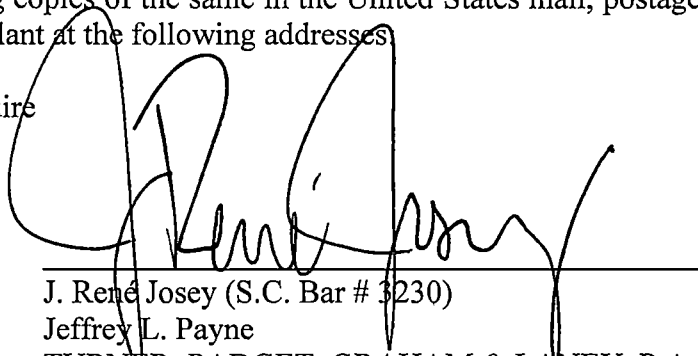
v.

Palmetto Floor Covering Installation, LLC,
and Florence Custom Countertops, Inc., Third-Party Defendants.

PROOF OF SERVICE

I certify that I have served a copy of the Respondent's *Second Motion for Extension for Initial Brief and Designation of Matter* by depositing copies of the same in the United States mail, postage prepaid, on January 13, 2020 to counsel for Appellant at the following addresses:

William Reynolds Williams, Esquire
Wilcox, Buyck, and Williams
Post Office Box 1909
Florence, SC 29503



J. René Josey (S.C. Bar # 3230)
Jeffrey L. Payne
TURNER, PADGET, GRAHAM & LANEY, P.A.
Post Office Box 5478
Florence, SC 29502-5478
843-656-4451 (Telephone)
843-413-5818 (Fax)

ATTORNEYS FOR RESPONDENT

Turner Padget

REPLY TO:

J. René Josey

E-Mail: JJosey@TurnerPadget.com
Writer's Direct Dial: (843) 656-4451
Writer's Direct Fax: (843) 413-5818

January 13, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Walt Parker v. John Curl
Appellate Case No.: 2019-001370
TP File No.: 4009.105

RECEIVED
JAN 15 2020
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed please find the Respondent's Second Motion to extend the Respondent's Initial Brief deadline and Record on Appeal Designation by thirty days. This motion is signed by both Jeff Payne, trial counsel of record for the Respondent, and me – as I have made an appearance as co-counsel for this appeal. The current deadline is Tuesday, January 21, 2020. We have consulted with counsel for the Appellant, W. Reynolds Williams, and he has consented to this request as is indicated by the enclosed email. This request is made, in part, to facilitate discussions between the parties about possible resolution of the matter.

I am enclosing the original and 6 copies of the Motion per Rule 240(d). Also enclosed is our original certificate of service as required by Rule 240(c)(1), SCACR. I am enclosing this firm's check in the amount of \$50.00 as payment and filing fee related to this Motion. Finally, I am enclosing a seventh copy of the Motion and an additional copy of the certificate of service so that a filed copy set can be returned to me in the self-addressed envelope also enclosed.

I appreciate your assistance and that of your staff in this matter.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

J. René Josey

JRJ/lap
Enclosures

cc: W. Reynolds Williams, Esq. (U.S. Mail and E-Mail)

Haster
011368LD
US POSTAGE \$001.60²
Z. 29502
011E11680426

Turner | Padgett
PO Box 5478, Florence, SC 29502

4009.105

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
JAN 15 2023
SC Court of Appeals