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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

Appellate Case No.: 2019-002099

RECEIVED
JAN 23 2020
SC Court of Appeals

Machelle Smith.....Appellant,

-v-

Columbia Sussex Corporation d/b/a Hilton Head Marriott Resorts and Spa;
Columbia Sussex Management, LLC; and,
Columbia Properties Hilton Head, LLC.....Respondents

MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT’S INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED
IN RECORD ON APPEAL

The Initial Brief and Designation of Matter to be Included in Record on Appeal of Appellant Machelle Smith is currently due to be filed and served January 17, 2020. Appellant respectfully requests an additional thirty (30) day extension of time in which to file her Initial Brief and Designation of Matter to be Included in Record on Appeal pursuant to Rule 234(b), South Carolina Rules of Appellate Procedure. This request is submitted out of necessity due to the undersigned’s schedule over the last month with the year end. No previous extension has been sought.

Due to time constraints, the undersigned has not been able to contact Respondent’s counsel to seek his consent. However, counsel will due so immediately.

Therefore, I respectfully request an extension of thirty (30) days to file and serve Appellant's Initial Brief and Designation of Matter to be Included on Record of Appeal.

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

January 17, 2020
Ridgeland, South Carolina

BY: 

Matthew V. Creech
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Attorneys for Appellant

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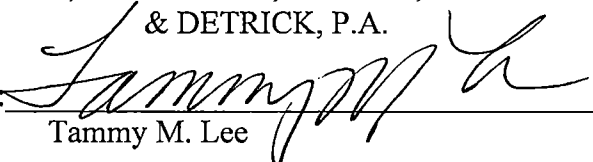
Columbia Sussex Corporation d/b/a Hilton Head Marriott Resorts and Spa;
Columbia Sussex Management, LLC; and,
Columbia Properties Hilton Head, LLC.....Respondents

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Motion for Extension has been served upon the following counsel of record by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 17th day of January, 2020.

Christian Stegmaier, Esquire
COLLINS & LACY, P.C.
Post Office Box 12487
Columbia, S.C. 29211

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

BY: 
Tammy M. Lee

January 17, 2020
Ridgeland, South Carolina

LAW OFFICES
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

PROFESSIONAL ASSOCIATION

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RANDOLPH MURDAUGH, SR.
(1887-1940)
RANDOLPH MURDAUGH, JR.
(1915-1998)
J. ROBERT PETERS, JR.
(1927-2008)
J. PAUL DETRICK
(1948-2016)
CLYDE A. ELTZROTH, JR. - RET

January 17, 2019

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

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JAN 23 2020

SC Court of Appeals

Re: *Machelle Smith v. Columbia Sussex Corporation*
Appellate Case No. 2019-002099

Dear Ms. Kitchings:

Enclosed for filing, along with our \$50.00 check for the filing fee, please find the original and seven copies of Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of the Record on Appeal in the above-referenced case.

Also enclosed is proof of service of the Motion on Respondent. Due to time constraints, I have not had the opportunity to consult with opposing counsel regarding Respondent's consent.

If you have any questions, please do not hesitate to contact our office.

With kind regards, I am

Sincerely,


Matthew V. Creech

Enclosures as stated

cc: Christian Stegmaier, Esquire

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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