

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
The Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Appellate Case No. 2018-002223

H. Hugh Andrews, Respondent,

v.

Quentin S. Broom, Jr., Appellant.

RECEIVED

JAN 28 2020

SC Court of Appeals

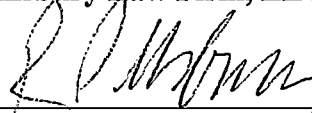
**RESPONDENT'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO INITIAL BRIEF OF APPELLANT**

Comes now, Respondent H. Hugh Andrews, by and through his undersigned attorney of record, Rodney F. Pillsbury of the Pillsbury Law Firm, does hereby move for an extension of time within which to respond to Appellant's Initial Brief received in my office on December 23, 2019.

A letter from the Court dated January 7, 2020 indicated some deficiencies in the Initial Brief. Given this, Respondent respectfully requests a thirty (30) day extension from the date these deficiencies are corrected and received in our office.

Respectfully submitted,

Pillsbury Law Firm, LLC.



Rodney F. Pillsbury (Fed Bar No.: 5963)

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January 23, 2020

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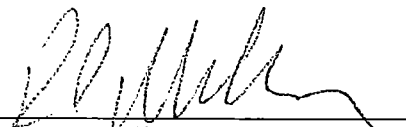
v.

SC Court of Appeals

Quentin S. Broom, Jr., Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of time to respond to the Initial Brief of Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on January 23, 2020 addressed to attorney of record, Matthew T. Richardson, Esq., Wyche, P.A., P O Box 12247, Columbia, SC 29211-2247


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January 23, 2020



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Phone: (864) 241-9828 / Fax: (864) 772-3418

January 23, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P O Box 11629
Columbia, SC 29211

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JAN 28 2020
SC Court of Appeals

Re: H. Hugh Andrews v. Quentin S. Broom, Jr.
Appellate Case No.: 2018-002223

Dear Ms. Kitchings:

We are enclosing for filing the following in the above referenced matter:

1. Respondent's Motion for Extension of Time to Respond to Initial Brief of Appellant;
2. Proof of Service for same.

By copy of this letter to opposing counsel, we are enclosing and serving upon him a copy of the same.

Please accept my best regards.

Very truly yours,

Pillsbury Law Firm, LLC

Rodney F. Pillsbury

RFP/tpd
enclosure(s)

cc: Matthew T. Richardson, Esq.
Wyche, P.A.
P O Box 12247
Columbia, SC 29211-2247

Pillsbury Law Firm, LLC
301 Rutherford Street
Greenville SC 29609



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The Honorable Jenny Abbott Kitchings
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