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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

JAN 28 2020

Appeal from Cherokee County  
Cherokee County Court of Common Pleas  
Hon. Judge R. Keith Kelly, Circuit Court Judge, Presiding

**SC Court of Appeals**

2017-CP-11-00330

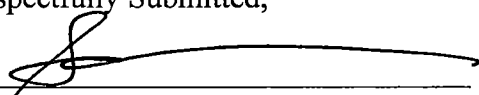
Gladys B. Potter.....Respondent,

Versus

Donald Moody and Shayan Investments Gaffney, LLC, of whom Shayan Investments Gaffney, LLC is the.....Appellant.

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

Respectfully Submitted,



Scarlet B. Moore, #72534  
Attorney for Appellant  
P.O. Box 17615  
Greenville, S.C. 29606  
(864) 214-5805  
(864) 752-0930 (FAX)

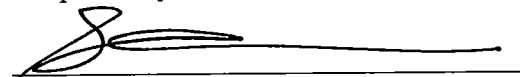
Greenville, South Carolina  
January 24, 2020.

**NOW INTO COURT**, comes the Appellant Shayan Investments Gaffney, LLC, who respectfully moves this Honorable Court for an extension to file the Initial Brief and Designation of Matter for the Record on Appeal, for the following reasons, to wit:

Undersigned counsel needs additional time to complete the Initial Brief and Designation of Matter for the Record on Appeal. As an initial matter, counsel has consulted with opposing counsel, William G. Rhoden, Esq., regarding undersigned counsel's request for an extension. Mr. Rhoden does not oppose the request for an extension, and consents to a thirty (30)-day extension for the Appellant to file the Initial Brief and Designation of Matter for the Record on Appeal. The parties also briefly talked about the possibility of settlement of this matter, which requires additional time and consideration with both clients. Lastly, undersigned counsel has suffered another loss of a loved one -- a very dear and close friend was unexpectedly admitted to the ICU on Wednesday, January 15, 2020, and died on January 18, 2020, which has hindered counsel's ability to complete the brief and designation.

**WHEREFORE**, the undersigned prays for an Order of this Court extending the time for counsel to file the initial brief and designation of matter to be included in the record on appeal for thirty (30) days.

Respectfully Submitted,



Scarlet B. Moore, #72534  
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Greenville, South Carolina  
January 24, 2020.

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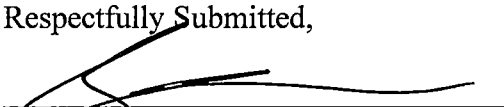
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**CERTIFICATE OF SERVICE**

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I certify that on this date, January 24, 2020, I served a copy of the Appellant's Motion to Extend the Time to File the Initial Brief and Designation of Matter to be Included in the Record on Appeal, and the Certificate of Service on the counsel of record by mailing the Notice to them to their addresses by depositing it in the U.S. Mail, in envelopes with sufficient postage affixed.

Respectfully Submitted,



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Greenville, South Carolina  
January 24, 2020.

**SCARLET B. MOORE, ESQ.**

*Attorney at Law*

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January 24, 2020

Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

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**JAN 28 2020**

**SC Court of Appeals**

**RE: Gladys B. Potter, Respondent versus Donald Moody and Shayan Investments Gaffney, LLC, of whom Shayan Investments Gaffney, LLC is the Appellant  
2017-CP-11-00330**

Dear Madam Clerk,

Enclosed please find the Appellant's Motion to Extend Time to File the Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above titled matter, along with the filing fee and a Certificate of Service. Please do not hesitate to contact me if the Court has questions regarding the enclosed. With kind regards, I remain

Very Truly Yours,



Scarlet B. Moore, Esq.  
Counsel for Appellant

SBM/sfk

Cc: William G. Rhoden, Esq.

Scarlet B. Moore  
Attorney at Law  
P.O. Box 17615  
Greenville, S.C. 29606

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