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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Appellate Case No.: 2019-001811

Best Choice Roofing & Home Improvement, Inc.....Appellant,

v.

Tyler Woods..... Respondent.

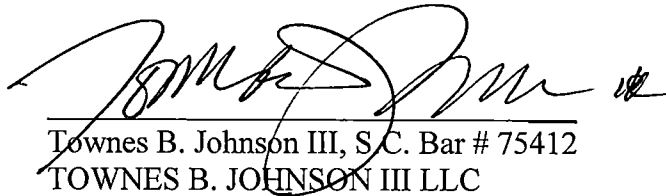
MOTION TO FILE OUT OF TIME

Pursuant to South Carolina Appellate Court Rules Rule 240, Appellant Respondent Best Choice Roofing & Home Improvement, Inc. (“Appellant”), by and through the undersigned attorney, respectfully moves this Court for an Order allowing Appellant to file out of time and granting an extension for serving and filing its Initial Brief to January 23, 2020.

On or about November 5, 2019, Appellant received the transcript of the underlying hearing. Counsel for Appellant has been conscientious in his efforts to prepare the Appellant’s Initial Brief; however, the holidays in addition to Appellant’s hearing and deposition schedule in the past month and throughout the course of this month have prevented Appellant from preparing same.

Appellant now respectfully moves this Court to grant its motion to file its Initial Brief out of time and respectfully asks that the deadline be moved to January 23, 2020.

Respectfully submitted,



Townes B. Johnson III, S.C. Bar # 75412

TOWNES B. JOHNSON III LLC

PO Box 9246

Greenville, S.C. 29604

(864) 757-4899

tjohnson@sc.legal

Attorney for Appellant

January 23, 2020

Other Counsel of Record:

Nekki Shutt, Esq.

Burnette Shutt & McDaniel, P.A.

P.O. Box 1929

Columbia, SC 29202 *Attorney for Respondent*

STATE OF SOUTH CAROLINA
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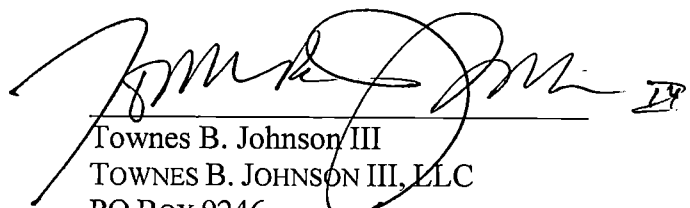
v.

Tyler Woods.....Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that a true copy of Appellant Best Choice Roofing & Home Improvement, Inc.'s Motion to File Out of Time and Appellant Best Choice Roofing & Home Improvement, Inc.'s Initial Appellant's Brief in the above-referenced case has been served on all parties of record by mailing a copy of same in the United States mail, postage prepaid this 23rd day of January 2020, addressed as follows:

Nekki Shutt, Esq.
Burnette Shutt & McDaniel, P.A.
P.O. Box 1929
Columbia, SC 29202


Townes B. Johnson III
TOWNES B. JOHNSON III, LLC
PO BOX 9246
GREENVILLE, SC 29604
PH: (864) 757-4899

January 23, 2020

Townes B. Johnson III
(864) 757-4899
tjohnson@sc.legal

Via Facsimile and Federal Express

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

**Re: Best Choice Roofing & Home Improvement, Inc vs. Tyler Woods
Appellate Case No. 2019-001811**

Dear Ms. Kitchings:

Enclosed, please find the following in the above-referenced matter:

- (1) the original and two (2) copies of Initial Brief of Appellant;
- (2) the original and two (2) copies of Appellant's Designation of Matter;
- (3) the original and six (6) copies of Appellant's Motion to File Out of Time;
- (4) a motion fee in the amount of \$50.00;
- (5) Proof of Service

Please send me a filed copy in the enclosed prepaid envelope.

Sincerely,



Townes B. Johnson, III

cc: Nekki Shutt, Attorney for Respondent

ORIGIN ID:GSPA (864) 757-4899
TOWNES JOHNSON
TOWNES B. JOHNSON III, LLC
PO BOX 9246

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GREENVILLE, SC 29604
UNITED STATES US

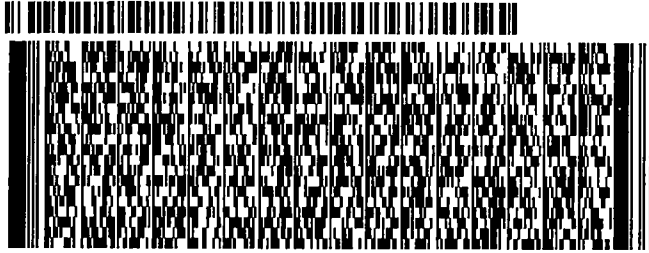
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TO **HONORABLE JENNY ABBOTT KITCHINGS**
SC COURT OF APPEALS
1220 SENATE STREET

56B.12/D/F82/FE4A

COLUMBIA SC 29201

(803) 734-1890 REF:
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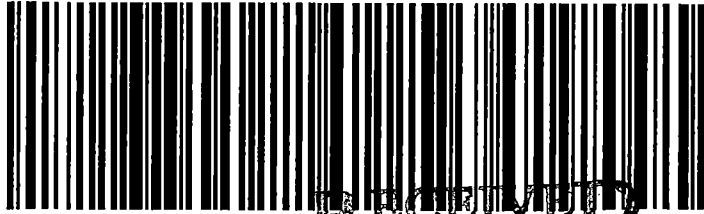


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SC Court of Appeals

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