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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Eugene P. Warr, Jr., Special Referee

Case No. 2016-CP-21-00702
Appellate Case No. 2019-001062

RECEIVED

FEB 03 2020

SC Court of Appeals

Vincent C. Carter d/b/a Elite Construction

Respondent,

v.

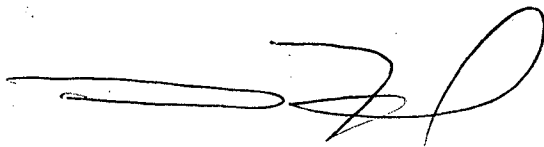
Eagles Landing Restaurants, LLC

Appellant.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240, SCACR, Respondent respectfully moves the Court for a 15-day extension of time to serve its Initial Brief. This is Respondent's second request for an extension of time in this matter. This is due to Counsel for Respondent having other obligations and filing deadline in other cases. In addition, counsel for Appellant has consented to this request.

Respectfully submitted,



January 31, 2020

Florence, South Carolina

PATRICK B. FORD

S.C. Bar No.: 102521

FINKLEA LAW FIRM

P.O. Box 1317

814 West Evans Street (29501)

Florence, SC 29503

Phone: (843) 317-4900

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E-mail: pford@finklealaw.com

Attorney for Respondent

Vevelyn L. Bradley

From: Brooks R. Fudenberg <Brooks.R.Fudenberg@Fudenberglaw.com>
Sent: Thursday, January 30, 2020 6:54 PM
To: Patrick Ford
Cc: Vevelyn L. Bradley
Subject: RE: Eagles Appeal

Patrick,

I consent.

Brooks R. Fudenberg
Law Office of Brooks R. Fudenberg, LLC
171 Church Street, Suite 160
Charleston, SC 29401
843-416-2558
910-401-1242 (eFax)

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL AND PRIVILEGED ATTORNEY-CLIENT OR ATTORNEY WORK PRODUCT INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER AND THEN DESTROY THIS COMMUNICATION.

From: Patrick Ford [mailto:pford@finklealaw.com]
Sent: Wednesday, January 29, 2020 8:56 AM
To: Brooks R. Fudenberg
Cc: Vevelyn L. Bradley
Subject: Eagles Appeal

Brooks,

I hope you are well. I want to apologize for not green lighting your extension requests regardless of my client's consent. In my naivety it appears I underestimated the time it takes to work an appeal while maintaining a full law practice. With that said, do you consent to an additional 15-day extension. I believe that would give me until February 17.

Thanks,

Patrick B. Ford, Attorney



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Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time upon counsel for the Appellant, Brooks, R. Fudenberg, Esquire, at the Law Office of Brooks R. Fudenberg LLC, 171 Church Street, Suite 170 Charleston, SC 29401 by depositing a copy of it in the United States Mail, postage prepaid, on January 31, 2020.

January 31, 2020

Florence, South Carolina



PATRICK B. FORD

S.C. Bar No.: 102521

FINKLEA LAW FIRM

P.O. Box 1317

814 West Evans Street (29501)

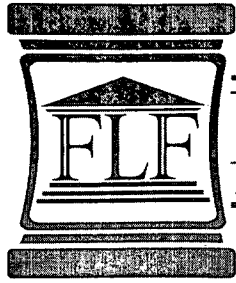
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Attorney for Respondent



FINKLEA LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW

Gary I. Finklea
Charlie J. Blake, Jr.
J. Gregory Hendrick
Patrick B. Ford
J. O'Neill Edwards
Susan C. McGill
B. Hicks Harwell, Jr.
(1933-2012)

January 31, 2020

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

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FEB 03 2020
SC Court of Appeals

Re: Elite Construction Co. vs. Eagles
Landing Restaurants, LLC
Appellate Case No. 2019-001062
Our File No.: 15511PFVB

Dear Ms. Kitchings:

Enclosed you will find the original and six copies of a Motion for Extension of Time and Proof of Service along with my firm's check in the amount of \$50.00. Also, enclosed please find a copy of correspondence from opposing counsel consenting to this request. By copy of this letter with enclosures, I am serving opposing counsel with copies of the same.

With kindest regards, I am

Very truly yours,

PATRICK FORD

PBF/vlb
Enclosure

Cc: Vincent Carter (w/enclosures)
Brooks R. Fudenberg, Esq. (w/enclosures)

15511



FINKLEA LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW

Post Office Box 1317
814 West Evans Street
Florence, S.C. 29503-1317

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FEB 03 2021

SC Court of Appeals

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

