

92315

RECEIVED
MAR 02 2020
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Business Court

Edward W. Miller, Circuit Court Judge

Case No. 2012-CP-23-2325
Appellate Case No. 2019-001909

Stop-A-Minit #17, LLC,Appellant,

v.

Beck Enterprises, Inc.,Respondent.

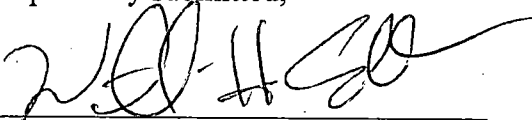
MOTION TO FILE INITIAL BRIEF OUT OF TIME

The undersigned, as counsel for Appellant, Stop-A-Minit #17, LLC, hereby respectfully moves this Court for permission to file the Initial Brief outside of the deadline established by Rule 208 of the South Carolina Appellate Court Rules. Appellant respectfully moves this Court for a 30 day extension of time to serve and file the Initial Brief of Appellant. The failure to file the Initial Brief was inadvertent and due to extraordinary circumstances. This request is not intended for purposes of delay. Further, there would be no prejudice to the parties by allowing the Appellant to file the Initial Brief outside of the deadline. Counsel for Respondent has consented to allowing the extension.

WHEREFORE, Appellant respectfully prays that this Court allow the Initial Brief of Appellant to be filed out of time.

Respectfully submitted,

By:



Moore Taylor Law Firm
William H. Edwards
1700 Sunset Boulevard
P.O. Box 5709
West Columbia, SC 29171
803-796-9160
will@mttlaw.com
Attorney for Appellant.

February 28, 2020

RECEIVED
MAR 02 2020
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Business Court

Edward W. Miller, Circuit Court Judge

Case No. 2012-CP-23-2325
Appellate Case No. 2019-001909

Stop-A-Minit #17, LLC,Appellant,

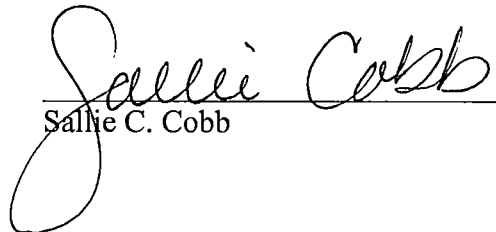
v.

Beck Enterprises, Inc.,Respondent.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal by US Mail, postage prepaid, upon counsel for the Respondent at the address listed below:

Erick Barbare
120 Renaissance Circle, Suite 6
Mauldin, SC 29662


Sallie C. Cobb

March 2, 2020

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
Stanley L. Myers
Jane H. Downey♦
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Lester McGill Bell, Jr.
Bryan C. Letteer
Edward Hood Dawson

Robert D. Hazel
RETIRED
Billy C. Coleman
RETIRED
C. David Sawyer, Jr.
RETIRED

February 28, 2020

The Honorable Jenny Abbott Kitchings
Clerk of Court for the SC Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED
MAR 02 2020
SC Court of Appeals

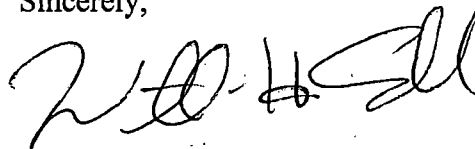
Re: Stop-A-Minit #17, LLC, v. Beck Enterprises, Inc.
Appellate Case No.: 2019-001909
Motion to File Initial Brief Out of Time

Dear Ms. Kitchings:

Enclosed for filing you will please find the original and six copies of the Motion to File the Initial Brief Out of Time for the Appellant and Certificate of Service in the above referenced matter. I have also enclosed the filing fee in the amount of \$50.00.

Thank you for your attention in this matter. Please do not hesitate to contact my office if you have any questions.

Sincerely,



William H. Edwards

WHE/ldt

Enclosures

Cc: Erick Barbare, Esq.