

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY
In The Circuit Court

The Honorable Brian Gibbons, Circuit Court Judge

Appellant Case No. 2019-001243

KATKAMS VENTURES, LLC and
SUPREMA, LLC, as successors in
interest to 521, LLC,

Respondents,

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v.

NO LIMIT, LLC d/b/a No Limit
Financial, LLC, and Erich Simpson,

Appellants.

APR 08 2020

SC Court of Appeals

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 263(b) and Rule 240 of the South Carolina Appellant Court Rules, the Respondents, by and through the undersigned counsel, move this Court for an Order granting an extension of time in which to serve their Initial Brief and Designation of Matters to Be Included on Appeal, or to be allowed to serve the same outside time, on the grounds stated below:

1. According to the records of the appeal, the Respondents' Initial Brief and Designation of Matters to Be Included in the Record on Appeal is due as of April 3, 2020.
2. Counsel for the Respondents believe the same can be supplied if a thirty (30) day extension period is allowed. This is the Respondents' second request for an extension of time, mostly due COVID-19.

The basis of this Motion is Rule 263(b) and Rule 240 of the South Carolina Appellant Court Rules, which are hereby incorporated in this Motion.

WHEREFORE, the Respondents herein move this Court for an extension of time, or for the right to file outside time, for a period of thirty (30) days in which to serve their Initial Brief and Designation of Matter to Be Included on Appeal.

March 31, 2020

/s/Brian W. Tyson, Esq.
Brian W. Tyson, SC Bar No. 102391
16928 Lancaster Highway, Suite 109
Charlotte, North Carolina 28277
Phone: (704) 644-1855 | Fax: (704) 644-1856
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Attorney for Respondents

Other Counsel of Record:

John Martin Foster, Esq.
P.O. Box 106
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Attorney for Appellants

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KATKAMS VENTURES, LLC and
SUPREMA, LLC, as successors in
interest to 521, LLC, Respondents,

v.

NO LIMIT, LLC d/b/a No Limit
Financial, LLC, and Erich Simpson, Appellants.

CERTIFICATE OF SERVICE

I certify that I have served the Respondents' Motion for Extension of Time, dated February 26, 2020, on the following counsel or persons of record, by depositing the same with the United States mail, with sufficient first class postage attached, properly address to the Clerk of Court for the South Carolina Court of Appeals, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out below, pursuant to Rule 262(b) of the South Carolina Appellate Court Rules:

John Martin Foster, Esq.
P.O. Box 106
Rock Hill, South Carolina 29731-6106
Attorney for Appellants

March 31, 2020

/s/Brian W. Tyson, Esq.
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LAW OFFICE OF PAUL H. BASS, PLLC

16928 Lancaster Highway, Suite 109
Charlotte, North Carolina 28277
Phone: 704.644.1855 • Fax: 704.644.1856

April 1, 2020

Sent via US Mail

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

Re: **South Carolina Appellate Court Case No. 2019-001243
Katkams Ventures, LLC, et al v. No Limit, LLC, et al
Respondents' Motion for Extension of Time**

Dear Ms. Kitchings:

Enclosed, please find the Respondents' Motion for Extension of Time, submitted pursuant to Rule 263(b) and Rule 240 of the South Carolina Rules of Appellate Procedure.

As evidenced by the Certificate of Service of the enclosed motion, our office has served the attorney for the Appellants with a copy of the herein referenced motion.

Thank you for your assistance in this matter. If you have any questions or concerns, please contact our office.

Thank you,

Brian W. Tyson, Esq.

Enclosed: Respondents' Motion for Extension of Time

*Cc: Mr. John Martin Foster, Attorney for Appellants (via US Mail)
P.O. Box 106, Rock Hill, South Carolina 29731-6106*

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TO: THE HONORABLE JENNY ABBOTT KITCHINGS
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