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**May 15 2020**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM EDGEFIELD COUNTY  
G. Thomas Cooper, Jr., Circuit Court Judge

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Case No. 2019-001689

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Bettis C. Rainsford,

Appellant.

v.

Apex Bank, Jim Clayton, Matt Daniels, and Brad Hailey,

Defendants.

Of whom, Matt Daniels and Brad Hailey are the Respondents.

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RESPONDENTS MATT DANIELS AND BRAD HAILEY'S MOTION FOR EXTENSION OF  
TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER

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Pursuant to Rule 263(b), SCACR, Respondents Matt Daniels and Brad Hailey ("Respondents") respectfully move this Court for an Order granting a ten (10) day extension of time in which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal which at present are due on May 20, 2020. This motion is not made for the purpose of undue delay, and is the first request for an extension of time from Respondents.

Counsel for Appellant has been consulted and consents to Respondents' request for a ten (10) day extension of time, which would make Respondents' Initial Briefs and Designation of Matter to be Included in the Record on Appeal due on May 30, 2020.

Respectfully submitted,  
ROE CASSIDY COATES & PRICE PA

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MATT DANIELS AND BRAD HAILEY

Greenville, South Carolina  
May 15, 2020

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PROOF OF SERVICE

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I, the undersigned attorney with Roe Cassidy Coates & Price, hereby certify that Respondents Matt Daniels and Brad Hailey’s Motion for Extension of Time to File Initial Brief and Designation of Matter was served on all counsel of record via electronic mail to the addresses indicated below:

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s/Ross B. Plyler

Ross B. Plyler

Greenville, South Carolina  
May 15, 2020

**From:** Reid Merline Eaddy  
**To:** Vincent Sheheen; shanonp@smithrobinsonlaw.com; freeman@belserra.com  
**Cc:** Ross B. Plyler; Jim Cassidy  
**Subject:** Bettis Rainsford v. Apex Bank, Clayton, Daniels and Hailey, Case No. 2019-001689  
**Date:** Friday, May 15, 2020 11:53:59 AM  
**Attachments:** [Respondents Motion for Extension of Time to file Initial Brief.pdf](#)  
[Proof of Service - Court of Appeals \(168\).pdf](#)

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**Sent on Behalf of Ross B. Plyler**

In accordance the recent order from the SC Supreme Court, enclosed and served upon you is Respondents Matt Daniels and Brad Hailey's Motion for Extension of Time to File Initial Brief and Designation of Matter regarding the Bettis Rainsford v. Apex Bank, Jim Clayton, Matt Daniels and Brad Hailey case, Case No. 2019-001689.

**Reid Merline Eaddy**  
*Senior Paralegal to Jack D. Griffeth and Ross B. Plyler*  
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**MESSAGE:**

Please contact our office if you have any questions or need additional information.

Thank you.

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