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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

MAY 14 2020

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2020-000320  
Trial Court Case No. 2016-CP-39-01223

Associated Receivables Funding, Inc., ..... Respondent,

vs.

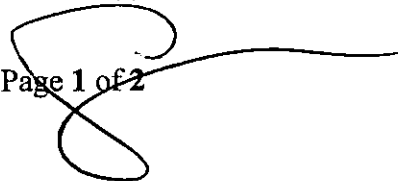
Dunlap, Inc.; James Stephen Dunlap, an Individual; Dunlap Industrial  
Coating Services, Inc.; Dunlap Industrial Services, Inc.; Classic Industrial  
Services, Inc.; and Mark Buerle, an Individual, ..... Defendants,

Of Which, Classic Industrial Services, Inc. is ..... Appellant.

**MOTION FOR ENLARGEMENT OF TIME**

PLEASE TAKE NOTICE THAT, pursuant to Rule 240, SCACR, the undersigned  
counsel for Classic Industrial Services, Inc., Appellant, is respectfully requesting an  
enlargement of the time within which to file and serve its initial opening brief, as well as  
its initial designation of matter for the record on appeal. In furtherance of this Motion,  
Appellant would respectfully advise that:

1. The business operations of Appellant's undersigned counsel have been  
somewhat limited during the month of April, due generally to the effects of the novel  
coronavirus within the State of South Carolina and the State's efforts to mitigate those  
effects (e.g., the Governor's shelter-in-place advisory), and more specifically, the fact that



the undersigned counsel's office was closed for several weeks due to the environment's inadvertent exposure to Covid-19 and the disinfection of that environment;

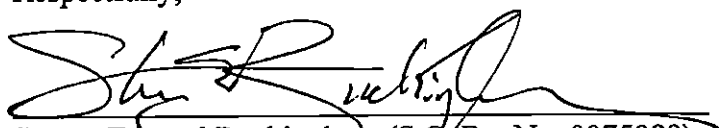
2. Prior to filing this Motion, the undersigned counsel consulted with counsel for Respondent, who has graciously consented to the enlargement herein requested; and,

3. This is the first request for enlargement that Appellant has made in this case.

Presently, Appellant's initial opening brief and designation matter for the record on appeal are due to be filed on Monday, May 11, 2020. Appellant is respectfully requesting a 30-day extension of the deadlines as to those filings. If this request is granted, Appellant's initial opening brief and designation of matter for the record on appeal will be due on Wednesday, June 10, 2020.

**WHEREFORE**, with the consent of Respondent's counsel, Appellant respectfully requests the extension herein made. Appellant's filing fee for this Motion is enclosed herewith.

Respectfully,



Steven Edward Buckingham (S.C. Bar No. 0075089)  
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Greenville, South Carolina  
May 6, 2020

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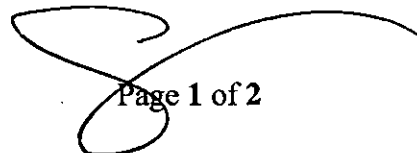
**PROOF OF SERVICE**

The undersigned counsel for Appellant hereby certifies, subject to penalty of perjury, that the following document(s) was/were served upon the following counsel of record by the following means as of the date identified below.

**Document(s):** (1) Motion for Enlargement of Time

**Counsel Served:** For Associated Receivables Funding, Inc.  
Townes B. Johnson III  
TOWNES B. JOHNSON III, LLC  
Post Office Box 9246  
Greenville, SC 29604  
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Means of Delivery: *Via Email Only*

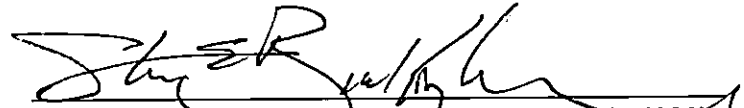


**Courts Served:** Office of the Clerk of the Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

Means of Delivery: *Via United States Postal Service, First Class*

**Date:** May 6, 2020

Respectfully,



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