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S.C. SUPREME COURT

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June 12, 2020

**VIA EMAIL – supctfilings@sccourts.org**

The Honorable Daniel E. Shearouse  
South Carolina Supreme Court  
P.O. Box 11330  
Columbia, South Carolina 29211

**Re: Martha M. Fountain vs. Fred's Inc., et al.**  
**Civil Action No.: 2010-CP-06-101**  
**Appellate Case No.: 2020-000651**

Dear Mr. Shearouse:

Enclosed for filing, please find a copy of a Consent Motion to Enlarge Time to File and Serve Return to Petition for Writ of Certiorari along with a Proof of Service. A check for the required \$50.00 filing fee will be mailed to the court within five days.

Please contact us should you have any questions.

With kind regards, I am,

Sincerely,

*s/Randi Lynn Roberts*

Randi Lynn Roberts

RLR/ash

Enclosures

cc: Morgan S. Templeton (w/enclosures, via email)  
John J. Dodds, IV (w/enclosures, via email)  
Matthew C. LaFave (w/enclosures, via email)

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas  
Doyet A. Early, III, Circuit Court Judge

Case No. 2020-000651

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Martha M. Fountain and Curtis Fountain.....Plaintiffs,

v.

Fred's, Inc., and Wildevco, LLC.....Respondents,

v.

Tippins-Polk Construction, Inc., and Rhoad's Excavating Services, LLC.....Third-Party  
Defendants.

Of Whom Tippins-Polk Construction, Inc. is the Appellant.

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**CONSENT MOTION TO  
ENLARGE TIME TO FILE AND SERVE RETURN TO PETITION FOR WRIT OF  
CERTIORARI**

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Respondent Wildevco, LLC hereby moves the Court to enlarge the time for the filing of its Return to Appellant's Petition for Writ of Certiorari. Respondent Wildevco, LLC's Return was due to be served and filed on June 11, 2020. Respondent Wildevco LLC is in the process of preparing its Return but respectfully requests until June 26, 2020, to file same. The undersigned conferred with counsel for Appellant as well as counsel for Respondent Fred's, Inc., who both consent to this Motion. Additionally, Appellant requests fifteen (15) days from the date of filing of Respondent Wildevco, LLC's Return to file a consolidated Reply to Respondents' Returns.

*(Signature page to follow)*

*s/Randi Lynn Roberts*

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June 12, 2020

Attorneys for Respondent Wildevco, LLC

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Defendants.

Of Whom Tippins-Polk Construction, Inc. is the Appellant.

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**PROOF OF SERVICE**

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I do hereby certify, on this 12<sup>th</sup> day of June, 2020, that a copy of the foregoing **Consent Motion to Enlarge Time to File and Serve Return to Petition for Writ of Certiorari** was served by electronic mail, addressed to counsel of record as follows:

Morgan S. Templeton, Esquire  
John J. Dodds, IV, Esquire  
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(Signature on following page)

*s/Randi Lynn Roberts*

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