

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM Horry County
Court of Common Pleas

The Honorable Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2016-CP-26-05916

RECEIVED
JUL 02 2020
SC Court of Appeals

Green Lotus Sports, LLC. Respondent

vs.

Black Bear Global, LLC Appellant

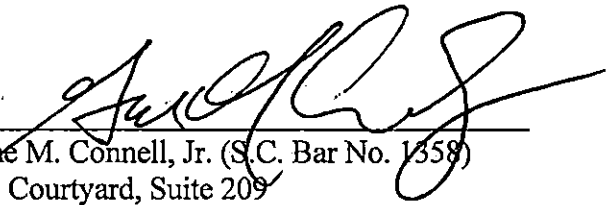
**MOTION FOR EXTENSION TO FILE APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellant, moves this Court for an Order extending the time to file Appellant's Initial Brief and Designation of Matter currently due July 6, 2020 in the captioned case. The basis of this Motion is the pandemic and the uncertainty of office hours in the coming weeks and months. This is Appellant's first request for extension in this matter.

WHEREFORE, Appellants' counsel respectfully requests this Court issue its Order granting him an extension to August 7, 2020 to file Appellants' Initial Brief and Designation of Matter.

Respectfully submitted

KELAHER, CONNELL & CONNOR, P.C.



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Attorneys for Appellant

July 1, 2020

THE STATE OF SOUTH CAROLINA
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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Motion for Extension to File Appellant's Initial Brief and Designation of Matter** on the Respondent, on the 1st day of July, 2020, by depositing a copy of same in the United States Mail, postage prepaid, to:

Natale Fata, Esquire
Nate Fata, P.A.
P.O. Box 16620
Surfside Beach, SC 29587

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 1st day of July, 2020.

Donna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
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LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

July 1, 2020

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Green Lotus Sports, LLC v. Black Bear Global, LLC, et al.*
Appellate Case No. 2020-000852
C/A No. 2016-CP-26-05916
Our File No. 2016-0188C

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Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion for Extension to File Appellant's Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$50.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on Respondent through counsel of record.

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc w/enc.: Nate Fata, Esquire



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