

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Eugene P. Warr, Jr., Special Referee

Case No. 2016-CP-21-00702
Appellate Case No. 2019-001062

RECEIVED
JUL 22 2020
SC Court of Appeals

Vincent C. Carter d/b/a Elite Construction

Respondent,

v.

Eagles Landing Restaurants, LLC

Appellant.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240, SCACR, Respondent respectfully moves the Court for a 20-day extension of time to serve its Final Brief. This is due to Counsel for Respondent having other obligations and filing deadline in other cases. In addition, counsel for Appellant has consented to this request.

Respectfully submitted,

July 21, 2020

Florence, South Carolina

s/Patrick B. Ford

PATRICK B. FORD

S.C. Bar No.: 102521

FINKLEA LAW FIRM

P.O. Box 1317

814 West Evans Street (29501)

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Attorney for Respondent

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PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time upon counsel for the Appellant, Brooks, R. Fudenberg, Esquire, at the Law Office of Brooks R. Fudenberg LLC, 171 Church Street, Suite 170 Charleston, SC 29401 by depositing a copy of it in the United States Mail, postage prepaid, on July 21, 2020.

July 21, 2020

Florence, South Carolina

s/Patrick B. Ford

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Attorney for Respondent



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ATTORNEYS AND COUNSELORS AT LAW

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Charlie J. Blake, Jr.
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Patrick B. Ford
J. O'Neill Edwards
Susan C. McGill
B. Hicks Harwell, Jr.
(1933-2012)

July 21, 2020

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

Re: Elite Construction Co. vs. Eagles
Landing Restaurants, LLC
Appellate Case No. 2019-001062
Our File No.: 15511PFVB

Dear Ms. Kitchings:

Enclosed you will find the original and six copies of a Motion for Extension of Time to file and serve Respondents Final Brief. Also enclosed are the original and one copy of the Proof of Service along with my firm's check in the amount of \$50.00. Also, please be advised that counsel for Appellant has consented to this Motion. By copy of this letter with enclosures, I am serving opposing counsel with copies of the same.

With kindest regards, I am

Very truly yours,


PATRICK FORD

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PBF/vlb
Enclosure

Cc: Vincent Carter (w/enclosures)
Brooks R. Fudenberg, Esq. (w/enclosures)



15511, 2

FINKLEA LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW

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Florence, S.C. 29503-1317

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SC Court of Appeals

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