

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Sep 21 2020

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2015-CP-10-3325 & Case No. 2017-10-05055
Appellate Case No. 2018-001413

Phillip DeClemente, a/k/a Alec Rochford, Appellant,

v.

Assistive Technology Medical Equipment Services,
LLC; Jeffrey Reed; Murrell G. Smith, Respondents,

and

Phillip DeClemente, a/k/a Phillip Goodpaster, Appellant,

v.

Assistive Technology Medical Equipment Services, LLC
(ATMES); Jeffrey Reed; Murrell G. Smith, Respondents.

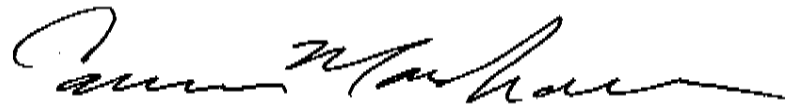
MOTION FOR EXTENSION OF TIME

The COVID-19 virus and office staffing issues necessitate this motion for extension of time in which to file Appellant’s Petition for Rehearing, in accordance with Rule 221, SCACR, of this Court’s decision issued September 9, 2020.

Pursuant to Rule 240, SCACR, Appellant and counsel therefore respectfully request an additional 30 days in which to submit their petition and supporting memorandum. The current

filing deadline is September 24, 2020. This is Appellant's first request for an extension of this filing deadline.

Respectfully submitted,



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Attorney for Appellant

September 21, 2020
Charleston, South Carolina

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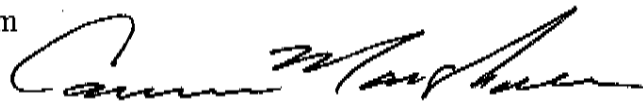
Assistive Technology Medical Equipment Services, LLC
(ATMES); Jeffrey Reed; Murrell G. Smith, Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below he served counsel for Respondents, Assistive Technology Medical Equipment Services, LLC, Jeffrey Reed, and Murrell G. Smith, James E. Smith, Jr. with a copy of Appellant's *Motion for Extension of Time* by emailing the same to the following address:

James E. Smith, Jr.
1422 Laurel Street
Columbia, S.C. 29201
james@jamesmithpa.com

September 21, 2020
Charleston, South Carolina



Cameron L. Marshall



September 21, 2020

VIA FACSIMILE ONLY

Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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RE: Phillip DeClemente, a/k/a Alec Rochford,
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Assistive Technology Medical Equipment Services, LLC
(ATMES); Jeffrey Reed; and Murrell G. Smith.
Case Tracking No. 2018-001413

Dear Ms. Kitchings:

Herewith please find Appellant's *Motion for Extension of Time* in reference to the above matter, along with proof of email service of this document on opposing counsel.

Thank you for your assistance in this matter.

Respectfully,

Cameron L. Marshall

Enclosures as stated

cc: James E. Smith, Jr.
1422 Laurel Street
Columbia, S.C. 29201
By Email to: james@jamesmithpa.com