

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

**Oct 09 2020**

**SC Court of Appeals**

APPEAL FROM GREENVILLE COUNTY  
COURT OF COMMON PLEAS

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No.: 2020-001164

159 Welborn Street, LLC, on behalf of itself and the State of South Carolina  
*Respondent,*

v.

Harold Means

*Appellant.*

APPELLANT'S MOTION FOR EXTENSION OF TIME

Appellant by and through his undersigned Counsel hereby respectfully requests a thirty (30) day extension of time in which to file Appellant's Initial Brief, from October 16, 2020 to November 16, 2020, in this matter. This is Appellant's first request for an extension. Counsel for the Appellant has consulted with Counsel for the Respondents, who has consented to the relief requested by way of this Motion.

Respectfully submitted,

**s/ Hannah Rogers Metcalfe**

Hannah Rogers Metcalfe, SC Bar No. 73046  
METCALFE & ATKINSON, LLC  
1395 S. Church Street  
Greenville, South Carolina 29605  
(864) 214-2319

Frank L. Eppes, S.C. Bar No. 7839  
Post Office Box 10066  
Greenville, SC 29603

Attorneys for Appellant

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PROOF OF SERVICE

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I certify that on October 9, 2020, I served Appellant's Motion for Extension of Time, by placing a copy into the U.S. Mail, postage prepaid, addressed to the Respondent's counsel of record by way of counsels' AIS email address, as well as by depositing a copy of it in the U.S. Mail, postage prepaid, address to:

George Campbell  
Jordan Teague  
Molly Hubbard Cash  
16 W. North Street  
Greenville, SC 29601

**s/ Hannah Rogers Metcalfe**  
Hannah Rogers Metcalfe, SC Bar No. 73046  
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Greenville, SC 29603

Attorneys for Appellant

# METCALFE & ATKINSON, LLC

ATTORNEYS AT LAW

October 9, 2020

**VIA ELECTRONIC MAIL**

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
ctappfilings@sccourts.org

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**Oct 09 2020**

**SC Court of Appeals**

**Re: 159 Welborn Street, LLC, on behalf of itself and the State of South  
Carolina v. Harold Means  
Appellate Case No.: 2020-001164**

Dear Ms. Kitchings:

Enclosed for filing please find Appellant's Motion for Extension of Time in the above-referenced case as well as the proof of service which reflects service of same upon opposing counsel.

I would very much appreciate your filing same and returning copies to me. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

s/ Hannah Rogers Metcalfe

Hannah Rogers Metcalfe  
hmetcalfe@malawfirm.com

HRM/awr  
Enclosure

cc: Frank Eppes, Esq.  
George Campbell, Esq.  
Jordan Teague, Esq.  
Molly Cash, Esq.