

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge  
Maite Murphy, Circuit Court Judge

Appellate Case No. 2020-000935

**RECEIVED**

**Nov 06 2020**

**SC Court of Appeals**

Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg  
Respondent,

v.

Jennifer Campney, Defendant,

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the  
Appellant.

RESPONDENT COOLING & WINTER LLC'S MOTION FOR ENLARGEMENT OF TIME

COMES NOW Respondent Cooling & Winter LLC and respectfully requests a 30-day  
enlargement of time through December 14, 2020 to file its initial brief and designation of matter, which is  
currently due on November 14, 2020. Respondent seeks this enlargement of time in order to thoroughly  
review the record in this matter and adequately prepare an initial brief and designation of matter. This is  
Respondent's first request for an enlargement of time and Respondent certifies that this motion is not  
being made for purposes of delay.

Respectfully submitted this 6 day of November, 2020.

/s/ Salvatore Louis Schiappa III  
Salvatore Louis Schiappa III  
Attorney for Respondent  
South Carolina Bar # 102134  
Cooling & Winter LLC  
220 N. Main St., Suite 500  
Greenville SC 29601  
864-605-3832

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PROOF OF SERVICE  
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The undersigned hereby certifies that the foregoing RESPONDENT COOLING & WINTER LLC'S MOTION FOR ENLARGEMENT OF TIME has been served upon the parties below by First Class United States Mail, postage prepaid at the following address:

John R. Cantrell, Jr.  
Counsel for Appellant  
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J. Ronald Jones, Jr.  
Caren D. Enloe  
Counsel for Respondent  
Smith Debnam Narron Drake Saintsing & Myers, LLP  
171 Church Street, Suite 120C  
Charleston, SC 29401

This 6 day of November, 2020.

/s/ Salvatore Louis Schiappa III  
Salvatore Louis Schiappa III  
Attorney for Respondent  
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