

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Nov 16 2020

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

SC Court of Appeals

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 November 16, 2020 to December 16, 2020, in this matter. Counsel for Appellant, Mr. Frank Eppes, tested positive for COVID-19 in late October and has been recuperating in quarantine. Therefore, counsel for Appellant asks for this extension to have additional time to prepare and file Appellant's Initial Brief. This is Appellant's second request for an extension. Counsel for the Appellant has consulted with Counsel for the Respondents, who will not consent to the relief requested by way of this Motion despite the extenuating circumstances surrounding the request.

Respectfully submitted,

s/ Hannah Rogers Metcalfe

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Attorneys for Appellant

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CERTIFICATE OF SERVICE

I certify that on November 16 2020, I served Appellant's Motion for Extension of Time, by email and by placing a copy into the U.S. Mail, postage prepaid, addressed to the Respondents' counsel of record as follows:

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

s/ Hannah Rogers Metcalfe

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Attorneys for Appellant

METCALFE & ATKINSON, LLC

ATTORNEYS AT LAW

November 16, 2020

Via Electronic Mail

The Honorable Jenny A. Kitchings
Clerk South Carolina Court of Appeals
1205 Pendleton Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org

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SC Court of Appeals

Re: 159 Welborn Street, LLC, on behalf of itself and the State of South Carolina
vs. 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,

Hannah Rogers Metcalfe

Hannah Rogers Metcalfe

hmetcalfe@malawfirm.com

HRM/awr
Enclosure

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