

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely Circuit Court Judge

Case No. 2020-CP-23-00631
Appellate Case No. 2020-000904

MARY EARLE

vs.

BOULDER LP

Respondent,

Appellant.

SECOND MOTION FOR EXTENSION OF TIME

Boulder LP, the Appellant, by and through its undersigned counsel, hereby moves for a second extension of time to file and serve the Reply Brief of Appellant. This motion is Appellant's second request for an extension. At this time, Appellant has not received the documents Respondent requested to be included in the Record on Appeal. The initial request for these documents was made on November 6, 2020. A follow-up request was made on November 12, 2020, as well as again on November 23, 2020. Based on Respondent's Designation of Matter, Appellant is uncertain as to the identity of some of the material and believes some of the proposed inclusions may not have been presented to either the magistrate court or the circuit court. As of the filing of this motion, Appellant has not yet received these documents and, therefore, cannot complete its Reply Brief or verify that the proposed material was before the lower courts.

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Therefore, pursuant to Rule 263 of the South Carolina Appellate Court Rules, the undersigned counsel moves for an extension of time of fourteen (14) days, making the date the Reply Brief of Appellant is due to be December 15, 2020.

Respectfully submitted,

/s/ Emily I. Bridges

M. Kevin McCarrell (S.C. Bar #76255)

Emily I. Bridges (S.C. Bar #102199)

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Attorneys for Appellant

November 30, 2020

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PROOF OF SERVICE

The undersigned employee of the law offices of Fox Rothschild LLP, attorneys for Appellant, do hereby certify that service of the SECOND MOTION FOR EXTENSION OF TIME was made on all counsel of record, specified below, by sending same via e-mail and mailing a copy of the same by United States Mail, postage prepaid, to the following addresses on November 30, 2020:

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November 30, 2020

Sent via E-mail (ctappfilings@sccourts.org) & US Mail

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: *Mary Earle v. Boulder LP*
Case No. 2020-CP-23-00631
Appellate Case No. 2020-000904

Dear Ms. Kitchings:

Enclosed are Appellant's Second Motion for Extension of Time and Proof of Service. These same documents are being both mailed and e-mailed to Clerk's office and counsel for Respondent.

Thank you for your assistance in this matter.

Sincerely,

FOX ROTHSCHILD LLP

/s/ Emily I. Bridges

Emily I. Bridges

EIB/bhb

Enclosures

cc: Vanessa Cason, Esquire (via e-mail-vanessa@vcasonlaw.com & US Mail)

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