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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
In the Court of Common Pleas for the Fifteenth Judicial Circuit
Hon. Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2020-000407

Douglas Kelsey Plaintiff,

v.

House of Blues Myrtle Beach Restaurant Corporation;
HOB Entertainment, Inc.; and Travis Scott Wagoner Defendants,

AND

House of Blues Myrtle Beach Restaurant Corporation Third-Party Plaintiff,

v.

Throttlefest, LLC; American Outlaw Spirits Incorporated; Full Throttle, LLC; and Full Throttle
Sloon Shine, LLC Third-Party Defendants,

of which House of Blues Myrtle Beach Restaurant Corporation is the Appellant
and Throttlefest, LLC is the Respondent.

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE BRIEF AND
DESIGNATION OF MATTER OF RESPONDENT THROTTLEFEST, LLC**

M. Dawes Cooke, Jr., Esq.
Jeffrey M. Bogdan, Esq.
BARNWELL WHALEY PATTERSON &
HELMS, LLC
288 Meeting Street, Suite 200 (29401)29401
P.O. Drawer H
Charleston, SC 29402
(843) 577-7700 Fax: (843) 577-7708
Counsel for Respondent

Pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure, Respondent Throttlefest, LLC, by and through undersigned counsel, hereby requests a thirty-day (30) extension of time to file Respondent's Initial Brief and Designation of the Matter ("Initial Brief").

As grounds for this Motion, Respondent cites the interruption of the responsive period due to the holidays and his present workload. This Motion is Respondent's first request for an extension for its Initial Brief. Appellant House of Blues Myrtle Beach Restaurant Corporation and Respondents American Outlaw Spirits Incorporated, Full Throttle, LLC, and Full Throttle Sloon Shine, LLC consent to this request.

Respondent's current deadline to file and serve their Initial Brief is January 20, 2021. With the requested extension, Respondent's deadline to file and serve its Initial Brief will be February 19, 2021.

Respectfully submitted,

January 14, 2021

BARNWELL WHALEY PATTERSON &
HELMS, LLC

By: 

M. Dawes Cooke, Jr., Esq.

Jeffrey M. Bogdan, Esq.

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Sloon Shine, LLC Third-Party Defendants,

of which House of Blues Myrtle Beach Restaurant Corporation is the Appellant
and Throttlefest, LLC is the Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Initial Brief on the
above-referenced Appellant and all other parties via electronic mail on January 14, 2021, at the
respective e-mail addresses for their attorneys of record, as follows:

Christian Stegmaier, Esq.
Amy Lynn Neuschafer, Esq.
Laura Ruth Baer, Esq.

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Counsel for Appellant House of Blues Myrtle Beach Restaurant Corporation

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*Attorney for Respondents American Outlaw Spirits Incorporated, Full Throttle, LLC,
and Full Throttle Sloon Shine, LLC*

January 14, 2021

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BARNWELL WHALEY

ATTORNEYS AT LAW

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MEMBER ATTORNEY
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SC Court of Appeals

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VIA E-MAIL ctappfilings@sccourts.org

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The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

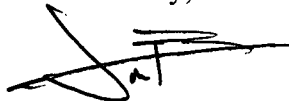
Re: Douglas Kelsey v. House of Blues Myrtle Beach
Appellate Case No. 2020-000407

Dear Ms. Kitchings,

Enclosed please find Respondent Throttlefest, LLC's Motion for Extension of Time to File Initial Brief and Proof of Service of same.

Thank you for your assistance.

Yours truly,



Jeffrey Bogdan

JMB/mm
Enclosures

cc: Christian Stegmaier, Esq.
Amy Lynn Neuschafer, Esq.
Laura Ruth Baer, Esq.
Brian C. Duffy, Esq.
Patrick Wooten, Esq.

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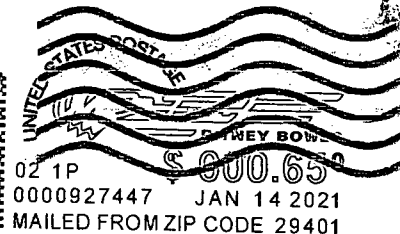
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CHARLESTON, SC 294

15 JAN 2021



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