

Miles E. Coleman
T 864.373.2352 F 864.373.2925
miles.coleman@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

2 W. Washington Street | Fourth Floor
Greenville, SC 29601
T 864.250.2300 F 864.232.2925
www.nelsonmullins.com

January 29, 2021

RECEIVED
Jan 29 2021
SC Court of Appeals

Via hand delivery

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

RE: Motion for extension of time
McMillan Pazdan Smith, LLC v. Donza H. Mattison
Appellate Case No. 2020-001645
Civil Action No. 2019-CP-23-00998
Our File No. 058964/01500

Dear Ms. Kitchings:

Due to undersigned counsel's multiple conflicting filing deadlines in this Court as well as other litigation deadlines, Respondents respectfully request a 30-day extension of time to file their Initial Brief and Designation of Matter. This is Respondents' first request for an extension of time in this matter, and the requested extension will cause no prejudice to any party.

According to our calculations, Respondents' Initial Brief and Designation are currently due on February 8, 2021. If the requested extension is granted, the new filing deadline would be **Wednesday, March 10, 2021**. We also ask that the Court hold the current deadline in abeyance until an Order is issued on this request.

Pursuant to Chief Justice Beatty's Amended Order dated May 29, 2020, we are serving and filing this document by electronic mail and without a filing fee. Please do not hesitate to contact us with any questions.

Very truly yours,



Miles E. Coleman
Counsel for Respondent

CC: (by electronic mail)
David E. Rothstein, Esq.
Samuel W. Outten, Esq.
Katie E. Towery, Esq.
Thomas H. Keim, Jr., Esq.

RECEIVED

Jan 29 2021

SC Court of Appeals

PROOF OF SERVICE

Pursuant to Section g(3) of Chief Justice Beatty's Amended Order dated May 29, 2020, undersigned counsel hereby certifies I have served Appellant's counsel in this action, listed below, with a copy of Respondents' letter-motion for extension of time by electronic mail (see attached).

Counsel Served:

David E. Rothstein
Rothstein Law Firm, PA
1312 Augusta Street
Greenville, SC 29605
drothstein@rothsteinlawfirm.com

Attorney for Appellant



Miles E. Coleman, Esq.
Counsel for Respondents

January 29, 2021

RECEIVED

Jan 29 2021

SC Court of Appeals

Miles Coleman

From: Miles Coleman
Sent: Friday, January 29, 2021 12:22 PM
To: drothstein@rothsteinlawfirm.com
Cc: Sam Outten; Katie Towery; tkeim@fordharrison.com
Subject: MPS v. Mattison -- Respondents' Mot. for First Ext. of Tim
Attachments: 2021.01.29 -- MPS v. Mattison -- letter request for first extension of time.pdf

David — please find attached for service a copy of Respondents' letter-motion seeking a 30-day extension of time for to file their Initial Brief and Designation of Matter. We will be filing this electronically with the Court of Appeals shortly.

Miles



MILES COLEMAN **PARTNER**

miles.coleman@nelsonmullins.com

GREENVILLE ONE | SUITE 400

2 W. WASHINGTON STREET | GREENVILLE, SC 29601

T 864.373.2352 F 864.373.2925

NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)
