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Feb 10 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
In the Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No. 2017-CP-42-00740

Appellate Case No. 2020-001642

Gibbs International, Inc., Respondent,

v.

Sarmad Harake, Eurosa, Inc., and Katherine Harake, Defendants, of whom Sarmad Harake and Eurosa Inc. are the Appellants.

MOTION FOR EXTENTION OF TIME TO FILE APPELLANTS' INITIAL BRIEF

Sarmad Harake and Eurosa, Inc. hereby move for an extension of time of thirty (30) days to file Appellants' Initial Brief. Respondent consents to this motion. Appellants' Initial Brief was originally due on January 16, 2021, and following an Order filed January 13, 2021, the deadline was extended to February 15, 2021. An Order granting a 30-day extension will make Appellants' Initial Brief due on or before March 17, 2021. This is Appellants' second request for an extension of time to file the Initial Brief. Pursuant to Supreme Court Amended Order 2020-05-29-02 *RE: Operation of the Appellate Courts During the Coronavirus Emergency*, Appellants do not enclose a motion filing fee, and files and serves this motion via e-mail using

the email addresses listed in the Attorney Information System.

Respectfully Submitted,

GALLIVAN, WHITE & BOYD, P.A.

/s Lindsay A. Joyner
John T. Lay, SC BAR NO. 64526
Curtis L. Ott, SC BAR NO. 66145
Lindsay A. Joyner, SC BAR NO. 77437
1201 Main Street, Suite 1200
Post Office Box 7368
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February 10, 2021

*Attorneys for Appellants Sarmad Harake
and Eurosa, Inc.*

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PROOF OF SERVICE

This is to certify that the undersigned counsel has caused to be served this day (1) copy of Motion for Extension of Time via electronic mail at the address stated in the Amended Order of the Supreme Court dated May 29, 2020 and as set forth below to the following:

Kevin A. Dunlap
Parker Poe Adams & Bernstein, LLP
100 Dunbar Street, Suite 206
Spartanburg, SC 29306
kevindunlap@parkerpoe.com
Counsel for Respondent

A copy of the email serving counsel for Respondent is attached hereto.

Respectfully Submitted,

GALLIVAN, WHITE & BOYD, P.A.

/s Lindsay A. Joyner

John T. Lay, SC BAR NO. 64526

Curtis L. Ott, SC BAR NO. 66145

Lindsay A. Joyner, SC BAR NO. 77437

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ljoyner@GWBlawfirm.com

February 10, 2021

*Attorneys for Appellants Sarmad Harake and
Eurosa, Inc.*

Lindsay Joyner

From: Lindsay Joyner
Sent: Wednesday, February 10, 2021 4:33 PM
To: kevindunlap@parkerpoe.com
Cc: Laura Sabo; John T. Lay (jlay@GWBlawfirm.com); 'Paterson, Fern A.'
Subject: Gibbs International, Inc. v. Harake et al. Appellate Case Number 2020-001642 [GWB-IMANMAIN.FID542496]
Attachments: 2021.02.10 Ltr to COA.pdf; 2021.02.10 Motion for Extension of Time.pdf

Kevin,

As permitted by part (g)(3) of Supreme Court Order 2020-05-29-02, I am herewith serving via email Appellant Sarmad Harake and Eurosa, Inc.'s Motion for Extension in the above-captioned matter. Shortly, I will be filing these documents with the Court of Appeals electronically as permitted by part c(6) of the Order, and will attach this email to the certificate of service of same.

Should you have any issues opening the attachments, please let me know. Thank you.

With warmest regards,

Lindsay



Lindsay Anne Joyner
Partner
ljoyner@GWBlawfirm.com

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This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

February 10, 2021

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1229 Senate Street
Columbia, South Carolina 29201

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Re: *Gibbs International, Inc., Respondent*
v. Sarmad Harake and Eurosa, Inc., Appellants
Case No. 2017-CP-42-00740
Appellate Case No. 2020-001642
GWB File No. 9567-1

Dear Ms. Kitchings:

Enclosed for filing please find Motion for Extension of Time to File Appellants' Initial Brief.
Should you have any questions please do not hesitate to contact me.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Lindsay A. Joyner

LAJ/lhs
Attachment
cc: Kevin A. Dunlap, Esquire