

**RECEIVED**

**May 24 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
In the Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

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Case No. 2017-CP-42-00740

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Appellate Case No. 2020-001642

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Gibbs International, Inc., Respondent,

v.

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

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**MOTION FOR EXTENTION OF TIME TO FILE APPELLANTS' INITIAL REPLY  
BRIEF**

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Sarmad Harake and Eurosa, Inc. hereby move for an extension of time of ten (10) days to file Appellants' Initial Reply Brief. Respondent consents to this motion. Pursuant to Rule 208 of the South Carolina Appellate Court Rules, Appellants' Initial Reply Brief was originally due on May 30, 2021, which is the Sunday before the Memorial Day holiday. An Order granting a ten-day extension will make Appellants' Initial Reply Brief due on or before June 9, 2021. This is Appellants' first request for an extension of time to file the Initial Reply 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

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May 24, 2021

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

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**PROOF OF SERVICE**

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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](mailto: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

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May 24, 2021

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

**From:** [Lindsay Joyner](#)  
**To:** [kevindunlap@parkerpoe.com](mailto:kevindunlap@parkerpoe.com)  
**Cc:** [Laura Sabo](#); [John T. Lay](#); ["Paterson, Fern A."](#); [Kelly Edrington](#)  
**Subject:** Gibbs International, Inc. v. Harake et al. Appellate Case Number 2020-001642 [GWB-IMANMAIN.FID542496]  
**Date:** Monday, May 24, 2021 3:48:20 PM  
**Attachments:** [2021.05.24 Ltr to COA re Mot for Extension.pdf](#)  
[2021.05.24 Mot for Extension Reply Brief.pdf](#)

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Kevin,

As permitted by part (g)(3) of Supreme Court Order 2020-05-29-02, I am herewith serving via email the Appellants' Motion for Extension of Time to File Appellants' Initial Reply Brief in the above-captioned matter. Shortly, I will be filing the attached documents with the Court of Appeals electronically as permitted by part c(6) of the Order, and will attach this email to the proof of service of the 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](mailto: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.

May 24, 2021

**RECEIVED**

**May 24 2021**

**SC Court of Appeals**

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

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 Reply 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