

RECEIVED

Aug 06 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No.: 2021-000424

The NEXT School, Inc., a Public, Not-for-Profit Corporation
Incorporated & Existing under the Laws of the State of South Carolina Appellant,

v.

AT-NET Services-Charlotte, Inc., a Private Corporation
Incorporated & Existing under the Laws of the State of North Carolina,
and American Arbitration Association, Inc., a Not-for-Profit Corporation
Incorporated & Existing under the Laws of the State of New York Respondent.

AND

AT-NET Services-Charlotte, Inc. Respondent,

v.

The NEXT School, Inc. Appellant.

MOTION FOR ENLARGEMENT OF TIME

PLEASE TAKE NOTICE THAT, pursuant to Rule 240, SCACR, the undersigned counsel for The NEXT School, Inc., Appellant, is respectfully requesting an enlargement of the time within which to file and serve its initial opening brief, as well as its initial designation of matter for the record on appeal. In furtherance of this Motion, Appellant would respectfully advise that:

1. Presently, Appellant's initial opening brief and designation of matter for the record on appeal are due to be filed on Wednesday, August 11, 2021;

2. Appellant's counsel and his wife welcomed the birth of their first child on Tuesday, July 13, 2021. However, due to complications with delivery, Appellant's counsel's wife was not discharged from the hospital until Monday, July 19;

3. Appellant's counsel is adjusting to life with a newborn, and is also working diligently to address work that was delayed for several weeks due to circumstances surrounding delivery;

4. This is the second request for enlargement that Appellant has made in this case; and,

5. Prior to filing this Motion, Appellant's undersigned counsel consulted with counsel for Respondent, who has graciously consented to the enlargement herein requested.

As noted above, Appellant's initial opening brief and designation matter for the record on appeal are due to be filed on Wednesday, August 11, 2021. Appellant is respectfully requesting a 30-day extension of the deadlines as to those filings. If this request is granted, Appellant's initial opening brief and designation of matter for the record on appeal will be due on Friday, September 10, 2021.

WHEREFORE, with the consent of Respondent's counsel, Appellant respectfully requests the extension herein made. It is Appellant's understanding that a filing fee for this Motion is not required at this time.

Respectfully submitted,

s/ Steven Edward Buckingham

Steven Edward Buckingham (S.C. Bar No. 0075089)
The Law Office of Steven Edward Buckingham, LLC
16 Wellington Avenue
Greenville, South Carolina 29609
(o) 864.735.0832
(e) seb@buckingham.legal

Attorney for Appellant

Greenville, South Carolina
August 6, 2021

RECEIVED

Aug 06 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No.: 2021-000424

The NEXT School, Inc., a Public, Not-for-Profit Corporation
Incorporated & Existing under the Laws of the State of South Carolina Appellant,

v.

AT-NET Services-Charlotte, Inc., a Private Corporation
Incorporated & Existing under the Laws of the State of North Carolina,
and American Arbitration Association, Inc., a Not-for-Profit Corporation
Incorporated & Existing under the Laws of the State of New York Respondent.

AND

AT-NET Services-Charlotte, Inc. Respondent,

v.

The NEXT School, Inc. Appellant.

PROOF OF SERVICE

The undersigned counsel for Appellant hereby certifies, subject to penalty of perjury, that the following document(s) was/were served upon the following by the following means as of the date identified below.

Document(s): Appellant’s Motion for Enlargement

Counsel Served: For Respondent AT-NET Services—Charlotte, Inc.
Adam C. Bach (S.C. Bar No. 0074885)
J. Brendan Kelley (S.C. Bar No. 102972)
Eller Tonnsen Bach, LLC

1306 S. Church Street
Greenville, SC 29605
(o) 864.236.5013
(e) abach@etblawfirm.com
bkelley@etblawfirm.com

Means of Delivery: *Via Email Only*

Courts Served: Office of the Clerk of the Court of Appeals

Means of Delivery: *Via email to ctappfilings@sccourts.org*

Date: August 6, 2021

Respectfully submitted,

s/ Steven Edward Buckingham

Steven Edward Buckingham (S.C. Bar No. 0075089)
The Law Office of Steven Edward Buckingham, LLC
16 Wellington Avenue
Greenville, South Carolina 29609
(o) 864.735.0832
(e) seb@buckingham.legal

Attorney for Appellant