

RECEIVED

Nov 04 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas, 13th Circuit

Perry H. Gravely, Circuit Court Judge

COMMON PLEAS CASE NO.: 2020-CP-23-01886

Tiger Enterprises & Trading Company Inc., Bonnie Walker and Dwight Walker,

Appellant,

v.

ARO-D Enterprises, LLC, Rudy Dixon, T3 Aviation Inc., and Frank T. Gangi,

Respondents.

**MOTION TO FILE APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTER OUT OF TIME**

Appellant Tiger Enterprises & Trading Company, Inc. ("Tiger"), pursuant to Rule 240, by and through their undersigned attorneys, hereby move for a one-day extension of time to file their Initial Brief and Designation of Matter. The current deadline is November 4, 2021, so we are requesting the deadline become Friday, November 5, 2021. The reason for this request for an extension is two reasons: (1) a two-week federal trial taking place allowing limited access to other files and work and (2) the deadline for this not being properly docketed due to confusion of when the due date was since there was no transcript to be ordered and received. Our office has since learned if this is the case that 30 days after filing the Notice of Appeal would start the timeclock and will properly docket in the future, please accept this request by the Appellant and

let us know how to pay the filing fee in the amount of \$50.00 since filing by email does not allow for payment to be made.

WESLEY D. FEW, LLC

s/Wesley D. Few/
Wesley D. Few, S.C. Bar No. 15565
Post Office Box 9398
Greenville, South Carolina 29604
(864) 527-5906 | wes@wesleyfew.com

ATTORNEYS FOR APPELLANT TIGER
ENTERPRISES & TRADING, INC., BONNIE WALKER
AND DWIGHT WALKER

Greenville, South Carolina
November 4, 2021

Appellant has below identified counsel of record in the underlying matter, who will be for Respondents in this appeal, each of which is being served via email in accordance with S.C. ACR 203:

James Jason Andrighetti, Esquire, S.C. Bar No. 72741
CULBERTSON ANDRIGHETTI, LLC
114 Manly St.
Greenville, SC 29601
P: 864-370-8222 | jj@palmettolawfirm.com

ATTORNEY FOR PLAINTIFF ARO-D ENTERPRISES, LLC AND 3RD PARTY
DEFENDANT RUDY A. DIXON

Steven Edward Buckingham, Esquire, S.C. Bar No. 75089
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 3RD PARTY DEFENDANTS FRANK T. GANGI AND T3
AVIATION, INC.

PROOF OF SERVICE

The undersigned hereby certifies that on November 4, 2021, the **Appellant Tiger Enterprises & Trading, Inc.'s Motion for Extension to File Initial Brief and Designation of Matter Out of Time** were served on all counsel of record and the Court of Appeals Clerk of Court via U.S. Mail/Email/ECF, as follows:

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals – Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

J.J. Andrighetti, Esq.
114 Manly Street
Greenville, SC 29601
jj@palmettolawfirm.com

ATTORNEYS FOR RESPONDENT ARO-D ENTERPRISES, LLC AND RUDY DIXON

Steven E. Buckingham, Esq.
16 Wellington Ave.
Greenville, SC 29609
seb@buckingham.legal

ATTORNEYS FOR RESPONDENTS T3 AVIATION AND FRANK T. GANGI

Greenville County Court of Common Pleas (*via e-file*)
305 E. North Street
Greenville, SC 29601
tcaldwell@greenvillecounty.org

/s/Cassy Young
Cassy Young

November 4, 2021
Greenville, South Carolina