

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 27 2021
SC Court of Appeals

APPEAL FROM ANDERSON COUNTY
CIRCUIT COURT

R. Scott Sprouse, Circuit Court Judge

Appellate Case No. 2021-000285

Moats Construction, Inc.....Appellant,

v.

City Council of the County of AndersonRespondent.

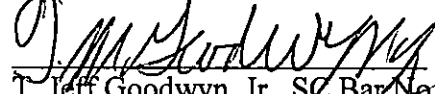
**MOTION FOR EXTENSION OF TIME TO REPLY TO RESPONDENT’S MOTION TO
STRIKE APPELLANT’S DESIGNATION OF MATTER**

Appellant, by and through their undersigned attorney hereby moves this Honorable Court for an extension to filing its response to Respondent’s Motion to Strike Appellant’s Designation of Matter, making the new deadline to reply as October 27, 2021. Appellant is filing its response contemporaneously with this motion. Appellant’s counsel has had problems with receiving emails since his recent change to a newer version of Microsoft Outlook and is still trying to work out the kinks. To date, Appellant has not received a hard copy of the of the Motion filed by Respondent’s counsel due to the address listed on the Certificate of Service is his former address.

Due to Appellant’s counsel not receiving the email and failure to receive a hard copy by mail, Appellant hereby request an extension to file their reply in this matter and asks that the filed response be considered timely filed.

Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr., SC Bar No. 73789

2309 Devine Street

Columbia, SC 29205

(803) 251-4517

jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina
October 27, 2021

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
CIRCUIT COURT

R. Scott Sprouse, Circuit Court Judge

Case No.: 2020-CP-04-01809

Moats Construction, Inc.....Appellant,

v.

City Council of the City of Anderson.....Respondent.


PROOF OF SERVICE

I certify that I have served the **Motion for Extension of Time to File a Response to Respondent’s Motion to Strike Matters from Appellant’s Designation of Matter** as well as **Appellant’s Response to Respondent’s Motion to Strike Matters from Appellant’s Designation of Matter** on J. Franklin McClain, Esquire and Stacey T. Coffee, Esquire, Attorneys for the Respondent, at the address below by depositing a copy of same in the United States Mail, postage prepaid, on October 27, 2021.

J. Franklin McClain, Esquire
Office of the City Attorney
401 South Main Street
Anderson, SC 29624

Stacey T. Coffee, Esquire
Logan & Jolly, LLP
P.O. Box 259
Anderson, SC 29622

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr. (73789)

2309 Devine Street
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
Attorney for Appellant

October 27, 2021

T. Jeff Goodwyn, Jr.*†

GOODWYN LAW FIRM, LLC

Tel. (803) 251-4517
Fax (803) 251-4527

2309 Devine Street
Columbia, South Carolina 29205

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

*Also Licensed in Georgia
† Certified Circuit Court Mediator

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Moats Construction, Inc. v. City Council of the City of Anderson*
Appellate Case No.: 2021-000285
Our File No.: 3000-0519

Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of a Motion for Extension of Time to File the Reply to Respondent's Motion to Strike Appellant's Designation of Matter along with a Proof of Service in regards to the above referenced matter. Please have your office file the original and return the filed, stamped copy to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees for same.

Also, enclosed please find an original and one copy of Appellant's Response to Respondent's Motion to Strike Matters from Appellant's Designation of Matter. Please also return a filed copy of same to my office.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Motion and Reply.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: J. Franklin McClain, Esquire
Stacey T. Coffee, Esquire