

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

LIVE OAK, LP,)
)
 Plaintiff,)
)
 v.) CIVIL ACTION NO. SPCV17-00909-KA
)
 LISA GOGGINS,)
)
 Defendant.)

EMERGENCY MOTION FOR CONTINUANCE OF TRIAL CALENDAR

COMES NOW Plaintiff Live Oak, LP, by and through its undersigned counsel, and respectfully moves the Court for a continuance of this case from the trial calendar of January 2, 2018. The reason for the request is as follows. The undersigned counsel for Plaintiff learned on Wednesday, December 20, 2017, that his gracious older brother has procured tickets and travel accommodations for him to attend the “Granddaddy of Them All”, the 104th Rose Bowl Game, where the 2017 SEC Champion University of Georgia Bulldogs (“Dawgs”), will face the Sooners from the University of Oklahoma in the College Football Playoff Semifinal in Pasadena, California, on January 1, 2018. This will be the Dawgs’ first appearance in the College Football Playoffs.¹ If the undersigned attends the game, he will need to travel home from California on January 2, 2018, and he will therefore be unable to appear at the bench trial as currently scheduled.

The 2018 Rose Bowl will be a momentous occasion for the Dawgs. As the undersigned’s colleague and UGA School of Law alumnus Dana Braun pointed out yesterday, this will be just the second time the Dawgs have appeared in the Rose Bowl,

¹ Indeed, the only other team from the Southeastern Conference to have appeared in the Playoffs to date is the University of Alabama Crimson Tide, the team from whence Dawgs’ head coach Kirby Smart came.

their first appearance having occurred some 75 years ago, in 1943, in the midst of World War II, when the Dawgs defeated the Bruins of UCLA 9-0.² See http://www.espn.com/college-football/story/_/id/21835467/georgia-bulldogs-rose-bowl-return-cheered-96-year-old-charley-trippi; <http://www.ajc.com/sports/video-check-out-what-happened-the-last-time-georgia-went-the-rose-bowl/bK8MyZ2eE0o7H8tQfZAZRL/>; https://en.wikipedia.org/wiki/1943_Rose_Bowl. The Wally Butts-coached team was led by Heisman Trophy winner Frank Sinkwich and Rose Bowl Player of the Game Charley Trippi. All three men are legendary Dawgs and members of the College Football Hall of Fame.

The UGA team that will face the Sooners on January 1, 2018, boasts many players who will almost certainly become legends in their own right. Running back Nick Chubb has charged into the position of second all-time in rushing yards in SEC and school history, behind only fellow Dawg Hershel Walker, voted the greatest football player of all time by FBS coaches. Linebacker Roquan Smith, a true game changer and human highlight reel, boasts a truly impressive list of accolades: SEC Defensive Player of the Year, Unanimous First-team All-American, SEC Championship Game MVP, and Butkus Award winner (Georgia's first). Georgia's quarterback Jake Fromm ("[m]y God, a freshman") was pressed into emergency duty in his first game in a UGA uniform after starter Jacob Eason went with an injury. Since then, Fromm has led Georgia to a 12-1 record (so far) and its first SEC Championship since 2005. In doing so, Fromm has passed for 2173 yards and 21 touchdowns, incurred an impressive 168.2 quarterback rating, and been named SEC Freshman of the Year.

² As noted by Dana Braun, if it's another 45 years before Dawgs appear in the Rose Bowl again, none of us will be alive, making this potentially a once-in-a-lifetime opportunity!

And then there is head coach Kirby Smart (“Kirby”), the former Dawg defensive back who has returned to his alma mater and, by all appearances, quickly built a juggernaut that will contend for championships for years to come. Kirby does not need a last name in Georgia any more, though his is an apt moniker. Kirby was salutatorian and senior class president at Bainbridge High School, home of the Bearcats.³ At Georgia, Kirby was a four-time member of the SEC Academic Honor Roll. He graduated from UGA with a degree in finance in 1999 and earned a master’s degree in Physical Education from Florida State while coaching there in 2003. He is widely considered to be one of, if not the, best recruiter of high school talent in the country, and the proof is in the pudding: Georgia signed the consensus number one recruiting class in the country earlier this week, during the inaugural NCAA early signing period. Kirby was named the 2017 SEC Coach of the Year in just his second year as a head coach, and he may just lead his alma mater to its first national championship since 1980 before the season is done.

It is truly great to be a Georgia Bulldawg, and to have a loving and generous older brother who has given me the opportunity to watch the Dawgs take on the Sooners in the most famous stadium in the land on New Year’s Day, at what will hopefully be the last stop before we play for, and win, a national championship. For this reason, I respectfully request that the court remove this case from the trial calendar of January 2, 2018, so that I may return home from the Rose Bowl that day. Plaintiff will seek no other continuances.

³ Kirby’s father Sonny Smart was the head football coach, his mother Sharon Smart was my English teacher, and my father Donnie Connell was the principal.

This 22nd day of December, 2017.

ELLIS, PAINTER, RATTERREE & ADAMS LLP

A handwritten signature in black ink, appearing to read 'J. Patrick Connell', is written over a horizontal line.

J. PATRICK CONNELL
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ORDER

Plaintiff's emergency motion for continuance having been read and considered, it is hereby GRANTED. This case is removed from the January 2, 2018 trial calendar.

So Ordered this ____ day of December, 2017.

Honorable Michael L. Karpf
State Court of Chatham County

CERTIFICATE OF SERVICE

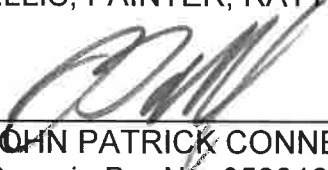
This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing document(s) as indicated below:

Lisa Goggins
8505 Waters Avenue, Apt. 09-066
Savannah, GA 31406

- depositing a copy in the United States Mail in a properly addressed envelope with adequate postage affixed thereto to ensure delivery;
- via facsimile number:
- by hand delivery.

Dated this 22nd day of December, 2017.

ELLIS, PAINTER, RATTERREE & ADAMS LLP



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