

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM MARLBORO COUNTY
The Hon. Paul M. Burch, Circuit Court Judge

Appellate Case No.: 2020-00989

Daisy Frederick,.....Respondent,

v.

Daniel Lee McDowell,.....Appellant.

**Respondent’s Motion for Extension of Time to Respond to Appellant’s
Petition for a Rehearing**

NOW COMES Respondent, by and through undersigned counsel, pursuant to Rule 263(b) SCACR, hereby respectfully moves this Court for an Order extending Respondent’s deadline to reply to Appellant’s Petition for a Rehearing by ten (10) days. In support of this motion, the Respondent submits the following:

1. Respondent was served with Appellant’s Petition for a Rehearing on August 4, 2022.
2. The time for the Respondent to respond is currently August 14, 2022.
3. Respondent needs additional time to prepare a proper response.
4. No previous extension of time has been requested.

5. Respondent submits that good cause exists to grant this Motion, as it is not made for the purpose of undue delay.

WHEREFORE, Respondent respectfully requests an extension of ten (10) days to respond to Appellant's Petition for a Rehearing, thereby making Respondent's new response deadline August 24, 2022.

Respectfully Submitted,

Poulin | Willey | Anastopoulos, LLC

s/ Eric M. Poulin

Eric M. Poulin, Esquire

S.C. Bar No.: 100209

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Attorney for Respondent

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REPLY TO ANN STREET OFFICE
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**Transportation & Insurance
Liability Division**

August 9, 2022

Sent via Certified Mail

South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

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RE: Daisy Frederick v. Daniel Lee McDowell
Appellate Case No.: 2020-00989

Dear Clerk:

We hope this letter finds you well. Enclosed for filing upon you are the following documents:

1. Respondent's Motion for Extension of Time to Respond to Appellant's Petition for a Rehearing

Please let us know if you have any questions.

Sincerely,

s/Samantha Montemagno

Samantha Montemagno
Paralegal

AKIM A. ANASTOPOULO (SC)
ERIC M. POULIN (SC)(GA)(NC)(CA)
ROY T. WILLEY, IV (SC)(KY)

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