

98011

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

JAN 23 2023

SC Court of Appeals

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

HONORABLE R. FERRELL COTHRAN, JR.

CASE NO.: 2019-CP-07-01995
APPELLATE CASE NO : 2022-001600

Ronnie L. Douglas,
Eric J. Douglas,
Jacqueline Walker,
Donna Harding, and
Diane Brenda Spears,

Appellants,

vs.

Kevin Holmes

Respondent.

NOTICE OF MOTION AND MOTION FOR
EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN RECORD ON APPEAL

The Appellant would respectfully request an extension of time within which to file the Initial Brief and Designation of Matter to be Included in Record on Appeal. The Initial Brief and Designation are due to be filed no later than January 23, 2023. The Appellant would respectfully request a forty-five (45) day extension of time in which to file the same.

Attorney for the Appellants, James H. Moss, underwent extensive skin cancer removal from his neck on January 5, 2023, requiring him to convalesce until February 3, 2022. Mr. Moss will again undergo additional surgery on January 19, 2023, which will require additional recovery time.

This motion is made upon the ground that an extension as requested would be in the best interest of justice and would not prejudice the Respondent.

It is accordingly respectfully requested that the Appellant be granted until March 9, 2023, to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal.

MOSS & KUHN, P.A.

By: 

James H. Moss
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Attorneys for Appellants

Beaufort, South Carolina
January 17, 2023

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

JAN 23 2023

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

SC Court of Appeals

HONORABLE R. FERRELL COTHRAN, JR.

CASE NO.: 2019-CP-07-01995
APPELLATE CASE NO : 2022-001600

Ronnie L. Douglas,
Eric J. Douglas,
Jacqueline Walker,
Donna Harding, and
Diane Brenda Spears,

Appellants,

vs.

Kevin Holmes

Respondent.

CERTIFICATE OF SERVICE

Undersigned certifies that the **Notice of Motion and Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter to Be Included in Record on Appeal**, to which this certificate is affixed, was served upon the parties to this action by email properly addressed to the attorney(s) of record:

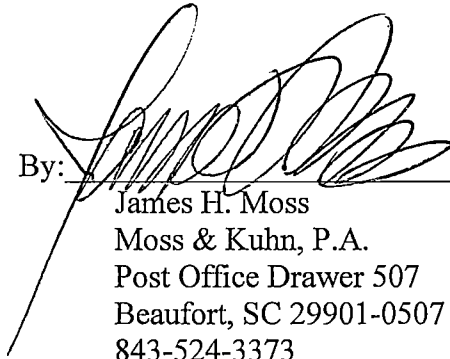
Samuel S. Svalina, Esquire
Sammy@svalinalawfirm.com

Jacob M. Hughes, Esquire
Jacob@svalinalawfirm.com

Laura Gregg, Esquire
lgregg@gregglawsc.com

on January 17, 2023.

By:

A handwritten signature in black ink, appearing to read 'James H. Moss', is written over a horizontal line. The signature is stylized and cursive.

James H. Moss
Moss & Kuhn, P.A.
Post Office Drawer 507
Beaufort, SC 29901-0507
843-524-3373
jim@mossamdkuhn.com

LAW OFFICES
MOSS & KUHN, P.A.

JAMES H. MOSS
H. FRED KUHN, JR.

1501 North Street, P. O. Drawer 507, Beaufort, South Carolina 29901-0507
TELEPHONE: 843-524-3373
FAX: 843-524-1302

January 17, 2023

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
JAN 23 2023
SC Court of Appeals

RE: Ronnie L. Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding and Diane Brenda
Spears v. Kevin Holmes
Appellate Case No.: 2022-001600

Dear Mrs. Kitchings:

Enclosed is the original of the Appellants Second Motion for Extension of Time to File the Initial Brief and Designation of Matter to be Included in Record on Appeal and Certificate of Service regarding the above-referenced matter along with my firm's check in the amount of \$50.00 for the filing of the same. By copy of this letter I am serving a copy of the motion on all counsel of record by email.

With kindest regards, I am

Very truly yours,

MOSS & KUHN, P.A.


James H. Moss

JHM:kmc
Enclosures

C: Samuel S. Svalina, Esquire (via email)
Jacob M. Hughes, Esquire (via email)
Laura A. Gregg, Esquire (via email)

James H. Moss, Esquire
Moss & Kuhn, P.A.
Post Office Drawer 507
Beaufort, SC 29901-0507



Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
JAN 23 2023
SC Court of Appeals

