

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
COURT OF COMMON PLEAS

The Honorable Marvin H. Dukes, III, Master in Equity and Special Circuit Court Judge

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RECEIVED  
JUN 14 2013  
SC Court of Appeals

Court of Appeals Case No. 2012-213578/  
Beaufort Case No. 09-CP-07-2608

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Lucille Patricia Smith, Respondent

v.

The Heirs of Law of Benjamin Days a/k/a Ben Deas a/k/a Daise, etc., et al,

Of whom Howard Chaplin and Harriet Chaplin are the Appellants

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**MOTION TO EXTEND TIME TO FILE RESPONDENT'S INITIAL BRIEF AND  
DESIGATION OF RECORD ON APPEAL**

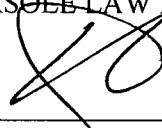
Respondent, Lucille Patricia Smith, pursuant to Rule 234(b), SCACR, move this Court for an Order granting this request for an extension of time to Respondent's initial brief and designation of record on appeal to July 15, 2013 .

Although undersigned counsel was trial counsel for Respondent, counsel was retained to represent Respondent in this Appeal on May 14, 2013, she obtained the trial transcript on or about May 30, 2013 and needs additional time to review the record to adequately prepare Respondent's initial brief. No prejudice to Appellant will result from this extension, but may cause prejudice to Respondent if this request is not granted.

For the foregoing reasons, Respondent respectfully requests an Order of this Court granting an extension of time to file her initial brief and designation of record to July 15, 2013.

Respectfully submitted,

EVERSOLE LAW FIRM, P.C.



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Alysoun M. Eversole  
1509 King Street  
Beaufort, SC 29901  
Phone: (843)379-3333  
Facsimile: (843)379-5558  
e-mail: [aeversole@eversolelaw.com](mailto:aeversole@eversolelaw.com)

Beaufort, South Carolina  
10<sup>th</sup> day of June, 2013.

ATTORNEY FOR THE RESPONDENT

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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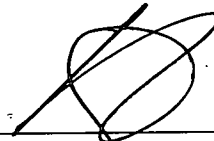
The Heirs of Law of Benjamin Days a/k/a Ben Deas a/k/a Daise, etc., et al,

Of whom Howard Chaplin and Harriet Chaplin are the Appellants

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**CERTIFICATE OF SERVICE BY MAIL OF  
MOTION TO EXTEND TIME TO FILE RESPONDENT'S INITIAL BRIEF  
AND DESIGNATION OF RECORD ON APPEAL**

The undersigned attorney for the Respondent hereby certifies that on the 10<sup>th</sup> day of June, 2013, she served by first class mail, postage prepaid, a true and correct copy of Respondent's Motion to Extend Time to File Respondent's Initial Brief and Designation of Record on Appeal to Bruce R. Hoffman, Esquire, Law Office of Bruce R. Hoffman, LLC, 574 Sea Island Parkway, St. Helena Island, SC 29920, attorney for Appellant.



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Alysoun M. Eversole  
EVERSOLE LAW FIRM, P.C.  
1509 King Street  
Beaufort, SC 29902  
(843) 379-3333

Beaufort, SC  
June 10, 2013

Alysoun M. Eversole  
Attorney at Law  
**EVERSOLE LAW FIRM, P.C.**  
1509 King Street  
Beaufort, SC 29902

Phone: (843)379-3333

[aeversole@eversolelaw.com](mailto:aeversole@eversolelaw.com)

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**SC Court of Appeals**

June 10, 2013

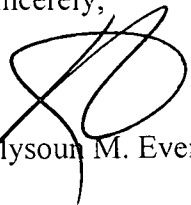
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Lucille Patricia Smith, Respondent v. Howard Chaplin, et al, Appellants  
Court of Appeals Case No.: 2012-213578

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of Respondent's Motion to Extend Time for Filing her Initial Brief. Please return the copies, clocked in, to us in the self-addressed stamped envelope provided herein. Thank you, in advance, for your attention to this request.

Sincerely,



Alysoun M. Eversole

Enclosures

cc: Bruce R. Hoffman, Esq.  
Lucille Patricia Smith