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Apr 12 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable William H. Seals, Jr., Circuit Court Judge

Case No. 2021-CP-22-00927
Appellate Case No. 2023-000063

Steven Michael Okun, as Personal Representative
of the Estate of Jane Luanne Okun..... Respondent

vs.

Pobuckra Properties, LLC and
Alliance Commercial Property Management, Inc Appellants

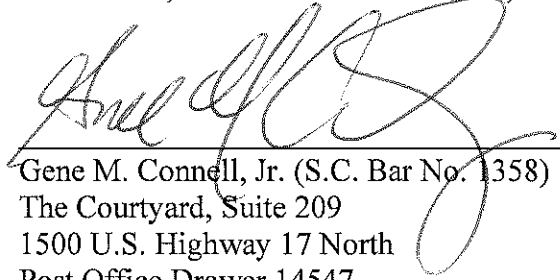
**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Respondent, moves this Court for an Order extending the time to file Respondent's Initial Brief and Designation of Matter currently due on April 19, 2023 in the captioned case. The basis of this motion is counsel's current court schedule.

WHEREFORE, Respondent's counsel respectfully requests this Court issue its Order granting Respondent an extension to May 19, 2023 to file Respondent's Initial Brief and Designation of Matter. This is Respondent's first request for extension in this matter.

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
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Attorney for Respondent

April 12, 2023
Surfside Beach, South Carolina

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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of **Motion for Extension of Time to File Respondent’s Initial Brief and Designation of Matter** on the 12th day of April, 2023 by depositing a copy of same in the United States Mail, postage prepaid, to:

M. Dawes Cooke, Jr., Esquire
D. Summers Clarke, II, Esquire
Barnwell Whaley Patterson & Helms, LLC
PO Drawer H
Charleston, SC 29402-0197

Agelo L. Reppas, Esquire
Colleen P. Sorensen, Esquire
BatesCarey LLP
191 North Wacker, Suite 2400
Chicago, IL 60606

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 12th day of April 2023

Donna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
SUITE 209
THE COURTYARD
1500 U.S. HIGHWAY 17 NORTH
P.O. DRAWER 14547
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SC Court of Appeals

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April 12, 2023

ctappfilings@sccourts.org

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

Re: Appellate Case No. 2023-000063
Steven Michael Okun, as Personal Representative of the Estate of Jane Luanne Okun v. Pobuckra Properties, LLC and Alliance Commercial Property Management,
C/A No. 2021-CP-22-00927
Our File No. 2021-0241C

Dear Ms. Kitchings:

Enclosed please find Respondent's Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. Our check for the \$50.00 filing fee is being mailed this date.

By copy of this letter, we hereby serve Respondent's Motion for Extension on counsel of record.

Should you have any question or need anything further at this time, please do not hesitate to contact me.

Sincerely yours,



Gene M. Connell, Jr.

GM CJr:sm
Enclosures

cc: M. Dawes Cooke, Jr., Esquire
D. Summers Clarke, II, Esquire
Agelo L. Reppas, Esquire
Colleen P. Sorensen, Esquire