

The State of South Carolina
In The Court of Appeals

Appeal from Spartanburg County
Hon. J. Derham Cole, Circuit Court Judge

Case No. 10-CP-42-2350

Jane Doe, as guardian for John Doe, Appellant

v.

Doni Rhinehart, Respondent

Motion to Extend Time

Plaintiff Jane Doe as guardian for John Doe moves the Court to Extend the Time to July 12 the time for filing the initial brief in this appeal.

Ground for the motion are that since February, 2013, counsel has been in various trial proceedings in different states, most recently concluding June 9, and was unaware that the hearing transcript ordered for this appeal had been received. It was received in May. Now that the transcript is available, the brief can be prepared. It should have been submitted June 5, and counsel moves for leave to file the initial brief out of time.

Respectfully submitted,



Gregg Meyers
Jeff Anderson & Associates, P.A.
366 Jackson Street
St. Paul, MN 55101
651-227-9990, 297-6543 facsimile

RECEIVED

JUN 25 2013

SC Court of Appeals

The State of South Carolina
In The Court of Appeals

68875

Appeal from Spartanburg County
Hon. J. Derham Cole, Circuit Court Judge

Case No. 10-CP-42-2350

Jane Doe, as guardian for John Doe, Appellant

v.

Doni Rhinehart, Respondent

Proof of Service

I hereby affirm that I have served upon counsel for the defendant/respondent a copy of the enclosed:

Motion to Extend Time

by causing a copy of the document to be placed in the United States mails, first-class postage pre-paid wrapper, properly addressed to:

James P. Walsh
Clarkson, Walsh, Terrell & Coulter, P.A.
1164A Woodruff Road
Greenville SC 29607

Done June 20, 2013

RECEIVED
JUN 25 2013
SC Court of Appeals



Gregg Meyers
Jeff Anderson & Associates, P.A.
366 Jackson Street
St. Paul, MN 29601
651-227-9990



JEFF ANDERSON & ASSOCIATES PA
REACHING ACROSS TIME FOR JUSTICE

June 20, 2013

Hon. Jenney Abbott Kitchings
Clerk of Court
Court of Appeals
PO Box 11629
Columbia, SC 29211

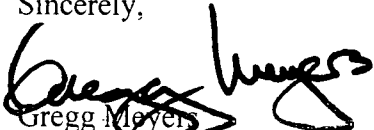
Re: Appeal of Order in Doe v. Rhinehart
Appellate Case No.: 2013-000807
Case No. 10-CP-42-2350 (Spartanburg County, Hon. J. Derham Cole)

Dear Ms. Kitchings:

Enclosed for filing in this appeal is an original and six copies of a Motion to Extend Time in the case captioned above, a filing fee for the motion, and a Proof of Service.

Please file with the Court this Motion and Proof of Service. Thank you very much.

Sincerely,


Gregg Meyers
gregg@andersonadvocates.com

GM:tld

Enclosure

cc: James P. Walsh, Esq. (w/encl.)

ATTORNEYS
JEFFREY ANDERSON
REGISTERED FOREIGN LAWYER
(UNITED KINGDOM)
Minnesota
Wisconsin
Illinois
Colorado
New York
Pennsylvania

MICHAEL FINNEGAN
Minnesota
Wisconsin
California

GREGG MEYERS
Minnesota
South Carolina

J. MICHAEL RECK
California
New York
Texas

SARAH ODEGAARD
Minnesota
California

JARED SHEPHERD
Minnesota
Alabama

ELIN LINDSTROM
Minnesota
Wisconsin

ANNIE KOPPLIN
Minnesota

OF COUNSEL
ANTHONY DEMARCO
California

OFFICE LOCATIONS
St. Paul, Minnesota
Pasadena, California
Chicago, Illinois
Milwaukee, Wisconsin
Charleston, South Carolina
New York, New York
London, England

RECEIVED

JUN 25 2013

SC Court of Appeals