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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 13 2023

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Mikell R. Scarborough

Appellate Case No. 2023-000599

Marc K. Knapp,

Appellant,

v.

James Douglas Jenkins, IV, Peter
Barnwell, and Alicia J. Roy,

Respondents.

MOTION OF APPELLANT TO EXTEND TIME TO FILE APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATERIAL

Pursuant to Rules 224 and 234(b), South Carolina Appellate Court Rules, the Appellant named above hereby moves for an Order from this Honorable Court granting the Appellant an extension of time to file Appellant's Initial Brief and Designation of Material in the above captioned matter. Said Motion is based upon the following grounds:

- (1) Appellant's counsel has considerable caseload and obligations regarding other pending matters, requiring additional time to research and draft an adequate brief on this appeal.

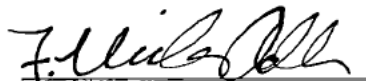
(2) The attorney for the Appellant respectfully requests an additional (60) sixty days from the date of filing this Motion to file the required documents.

(3) Appellant's counsel ordered two transcripts for this appeal, receiving the second one on June 5, 2023.

(4) Appellant's counsel believes that there would be no prejudice to this case in the granting of the Motion and believes that the matters set forth above constitute good cause for the granting of said Motion.

WHEREFORE, Appellants pray that this Honorable Court inquire into the matters set forth herein and issue its Order granting this Motion of Appellant to Extend Time to File Appellant's Initial Brief and Designation of Material and holding all time limits concerning this appeal in abeyance pending a ruling on this Motion.

Respectfully submitted,



F. Miles Adler
SC Bar No. 70238
ADLER LAW FIRM, LLC
Post Office Box 4743
Pawleys Island, SC 29585
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Attorney for Appellant

Pawleys Island, SC
June 12, 2023

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough

Appellate Case No. 2023-000599

Marc K. Knapp,

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v.

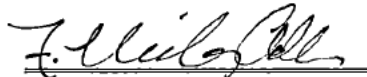
James Douglas Jenkins, IV, Peter
Barnwell, and Alicia J. Roy,

Respondents.

PROOF OF SERVICE

I certify that I have served the Motion of Appellants to Extend Time to File Appellant's Initial Brief and Designation of Material on James Douglas Jenkins, IV, Peter Barnwell, and Alicia J. Roy by depositing a copy of it in the United States Mail, postage prepaid, on June 12, 2023, addressed to their attorney of record, David K. Haller at 604 Savannah Highway Charleston, SC 29407.

Pawleys Island, SC
June 12, 2023



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12 June 2023

VIA UPS

The Honorable Jenny Abbott Kitchings
South Carolina court of Appeals
1220 Senate Street
Columbia, SC 29211

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JUN 13 2023

SC Court of Appeals

Re: *Marc K. Knapp v. James Douglas Jenkins, IV, Peter Barnwell, and Alicia J. Roy*
Appellate Case No.: 2023-000599

Dear Ms. Kitchings:

Please find enclosed original and (6) copies of the Motion of Appellants to Extend Time to File Appellants' Initial Brief and Designation of Material and a Proof of Service along with the \$50.00 filing fee. I ask that you please return the clocked copies in the self-addressed stamped envelope provided.

By copy of this letter to David K. Haller, the attorney for the Respondent, I am serving him with my Motion and Proof of Service.

Should you have any questions, please feel free to contact me at 843.685.3311.

Sincerely,



F. Miles Adler

Enclosures

cc: David K. Haller

Extremely Urgent

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