

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2012-CP-46-2692
Appellate Case No. 2012-213352

RECEIVED

JUL 08 2013

SC Court of Appeals

69012

Paul Sullivan as Personal Representative of the
Estate of Pauline C. Cook,.....Respondent,

v.

Park Pointe Village, Inc., a wholly owned subsidiary of
ACTS Retirement-Life Communities, Inc., Neva Lattimer,
and Marvin Lawrence,.....Appellants.

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

Respondent Paul Sullivan as Personal Representative of the Estate of Pauline C. Cook, by and through his undersigned attorneys, moves for an extension of time in which to file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal. Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal are due to be filed on July 10, 2013. Respondent requests that the Court extend the deadline for the filing of his Initial Brief and Designation of Matter to be Included in the Record on Appeal to August 9, 2013.

The undersigned counsel certifies that good cause exists for this extension and that this is the first request for an extension to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal. Further, attorneys for Respondent have a pressing workload which has prevented them from devoting the time necessary to finalizing Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

For the reasons stated above, Respondent respectfully requests that the Court grant a thirty-day extension of time during which he may file his Initial Brief and Designation of Matter.



Richard A. Harpootlian (SC Bar No. 2725)
Graham L. Newman (SC Bar No. 72845)
M. David Scott (SC Bar No. 68667)
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ATTORNEYS FOR RESPONDENT

Columbia, South Carolina
July 8, 2013

THE STATE OF SOUTH CAROLINA
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Paul Sullivan as Personal Representative of the
Estate of Pauline C. Cook,..... Respondent,

v.


Park Pointe Village, Inc., a wholly owned subsidiary of
ACTS Retirement-Life Communities, Inc., Neva Lattimer,
and Marvin Lawrence,.....Appellants.

CERTIFICATE OF SERVICE

I, Beth Craft, on behalf of Richard A. Harpootlian, P.A., hereby certify that I served the following individual(s), on July 8, 2013, with a copy of the following:

Document: Motion for Extension of Time to File Initial Brief and Designation of Matter to be included in the Record on Appeal.

Counsel: VIA U.S. MAIL
R. Gerald Chambers, Jr., Esquire
Carmelo B. Sammataro, Esquire
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July 8, 2013
VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

In re: Paul Sullivan as Personal Representative of the Estate of Pauline C. Cook v. Park
Pointe Village, Inc., Neva Lattimer, and Marvin Lawrence
Appellate Case No. 2012-213352

Dear Ms. Kitchings:

Enclosed please find for filing the original and eight (8) copies of Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal.

I would appreciate you filing the enclosed and forwarding the clocked copies to my courier. By copy of this letter, I am serving opposing counsel with a copy of the same.

With warm personal regards, I am

Sincerely,



M. David Scott

/sec

Enclosure(s)

cc: R. Gerald Chambers, Jr., Esquire
Carmelo B. Sammataro, Esquire