

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence

Master in Equity

Case No. 2019-CP-32-00630
Appellate Case No. 2023-01417

James G. Sercu and Sherri A. Sercu,

Respondents,

v.

Douglas Steven Hart,

Appellant.


MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

YOU WILL PLEASE TAKE NOTICE that, pursuant to Rules 208, 209, 240, and 263(b) of the South Carolina Appellate Court Rules, the Respondents James G. Sercu and Sherri A. Sercu, by and through their undersigned attorney, moves for an Order granting an additional thirty (30) day extension of time within which to file the Initial Brief of Respondents—through December 8, 2023. This motion is the Respondents' first request for extension and is made on the grounds that the undersigned counsel has had other deadlines, depositions, hearings, and other case commitments arise unavoidably over the coming weeks, Thanksgiving holiday and

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proper preparation for which has precluded counsel's ability to devote the requisite time to the research and drafting of the Initial Brief of Respondent; and counsel needs the additional time requested herein to properly present focused and cogent arguments.

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BY: 
James Randall Davis, SC Bar No. 1580
ATTORNEYS FOR RESPONDENTS

Lexington, South Carolina
October 31, 2023

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PROOF OF SERVICE

I, Nicole T. Price, a paralegal with the law firm of DAVIS | FRAWLEY, LLC, do hereby certify that I have served the following with the foregoing **MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**, by mailing a copy of same to them at the following address:

C. Cantzon Foster, II, Esquire
Foster Law Office, LLC
3100 Devine Street
Columbia, SC 29205
Attorneys for Appellant

on this 31st day of October, 2023 all in accordance with Rule 5 (b)(1) of the South Carolina Rules of Civil Procedure.



Nicole T. Price, Paralegal
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October 31, 2023

VIA ELECTRONIC MAIL
South Carolina Court of Appeals
Attn: The Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street (29201)
P.O. Box 11629
Columbia, South Carolina 29211

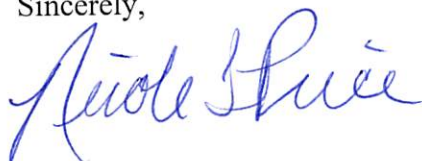
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RE: James G. Sercu and Sherri A. Sercu v. Douglas Steven Hart
Appellate Case No.: 2023-01417

Dear Ms. Kitchings:

Enclosed please find the *Motion for Extension of Time to File Initial Brief* regarding the above referenced matter. I am serving all other parties in this matter by copy of this letter and email. Please let me know if the Court requires anything further.

Sincerely,



Nicole T. Price
Paralegal

Enclosure

cc: C. Cantzon Foster, II, Esquire
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