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Nov 22 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Honorable Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2023-001200
Civil Action No. 2020-CP-10-04714

William Gorham and Rosalee Gregg Smalls, Plaintiffs,

v.

Alan Gregg, Victoria Manigault, Mary Frances Gregg Steed, Dorothy Gregg Horlbeck, Robert Leroy Gregg, Franklin Gregg, Michael Gregg, Agnes Gregg (daughter of Jesse Gregg), Joanne Gregg (daughter of Jesse Gregg), Murray Chavis, John Doe and Jane Doe, as fictitious names for a class of unknown heirs, devisees, distributees, administrators, or personal representatives of deceased persons Harriet Gregg, Leroy Gregg, Henrietta Fishburn, Agnes Gregg Washington, Jessse "Eddie" Gregg, James Gregg, Leory Gregg, Jr., Agnes A. Gregg, Jesse Gregg, Robert Gregg, and all other persons known or appear of record to have some right, title, interest in, or lien upon the real estate described in the complaint herein, Defendants.

Of whom William Gorham is the Appellant and Robert Leroy Gregg is the Respondent.

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

Pursuant to Rule 240, SCACR, Respondent Robert Leroy Gregg ("Gregg") hereby moves for an extension of time in which to serve and file the Respondent's Initial Brief and Designation

of Matter to be included in the Record on Appeal. Gregg requests an extension of forty-five (45) days to file the Initial Brief and Designation of Matter which are currently due November 29, 2023. This is the first request for an extension filed by Gregg.

The grounds for this motion are that other impending professional obligations of Respondent's counsel have created a need for additional time to prepare the Initial Brief and Designation of Matter. A forty-five (45) day delay will not prejudice the rights of any of the parties.

For the foregoing reasons, Respondent Gregg respectfully requests a forty-five (45) day extension for filing and serving the Initial Brief and Designation of Matter. Further, Respondent respectfully requests that the current deadline be held in abeyance until such time as the Court issues its order on this motion.

Dated: November 22, 2023

s/Barry I. Baker
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Attorney for Appellant

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Of whom William Gorham is the Appellant and Robert Leroy Gregg is the Respondent.

PROOF SERVICE

I certify that a true copy of the Motion for Extension of Time For Respondent to Serve and File Initial Brief and Designation of Matter to Be Included in the Record on Appeal in the within matter has been served on Appellant, this 22nd day of November, 2023, by emailing a copy to Respondent's counsel at karen@dejonglawfirm.com pursuant to Rule 262 of the South

Carolina Appellate Court Rules and further a courtesy copy has been deposited in the United States Mail, postage prepaid, on November 22, 2023 addressed to his attorney, Karen M. DeJong of DeJong Law Firm LLC, 222 West Coleman Blvd., Suite 110, Mt. Pleasant, SC 29464.

Dated: November 22, 2023

s/Barry I. Baker
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November 22, 2023

VIA EMAIL & FEDEX

The Honorable Jenny Abbott Kitchings
Clerk of Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Appellate Case No. 2023-001200
Gorham v. Gregg, et al.

Dear Ms. Kitchings:

Enclosed please find our firm's check in the amount of \$50.00 as payment for the Respondent's Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter to be Included in the Record On Appeal in the above referenced matter. This Motion was electronically filed today.

Should the Court have any questions or need anything further, please do not hesitate to contact me.

Thank you for your time and consideration in this matter.

Yours truly,

s/ Barry I. Baker

Barry I. Baker

BIB/ktv

Enclosure: stated

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