

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHESTER COUNTY  
In The Circuit Court

B. Alex Hyman, Circuit Court Judge

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Appellate Case No. 2023-001089

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ROBERT F. GOOREY,

Appellant,

v.

DEBORAH A. GOOREY and  
SHAWN GOOREY,  
of whom SHAWN GOOREY is the

Respondent.

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MOTION FOR EXTENSION OF TIME

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Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellant, by his counsel herein, moves this Court for an order granting him an extension of time as to his Initial Brief and Designation of Matter to Be Included in the Record on Appeal, on the grounds stated below:

1. Despite attempts, counsel for Appellant has been prevented from completion of his Initial Brief by reason of the press of business in his office, including emergency hearings and deadlines.
2. By previous Order of this Court, the Initial Brief and Designation of Matter to Be Included in the Record on Appeal are due as of November 28<sup>th</sup>, 2023.
3. To this end, and in light of the holiday season, counsel for Appellant requests an additional extension of time, for a period of thirty (30) days, to complete the Appellant's Initial Brief and Designation of Matter to Be Included in the Record on Appeal. If it is the decision of the

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**SC Court of Appeals**

Court to allow some shorter period, counsel will comply.

The basis of this Motion is the within-cited Rules, the records of this appeal, and any attached affidavit or stipulation of the undersigned, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellant herein moves this Court to be allowed for an extension of time to file his Initial Brief and Designation of Matter, as set out above, pursuant to Rule 240 and 263(b), S.C.A.C.R.

/s/ John Martin Foster  
Post Office Box 106  
Rock Hill, S. C. 29731  
803 324-8100  
Attorney for Appellant

November 28, 2023

Rock Hill, South Carolina

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of time dated November 28, 2023, on the following counsel or persons of record:

April D. Porter  
Attorney for Deborah Goorey  
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by service to the opposing lawyer's primary e-mail address listed in the Attorney Information System (AIS), as authorized by Section d(1) of the Order of the Supreme Court dealing with Electronic Filing and Service amended May 6, 2022.

November 28, 2023

/s/ John Martin Foster  
Post Office Box 106  
Rock Hill, S. C. 29731  
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Attorney for Appellant

Rock Hill, South Carolina