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Dec 19 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2022-01785

Judy Tupolo,

Respondent,

v.

Jirair Baghdassarian,

Appellant.

MOTION FOR EXTENSION OF TIME

December 19, 2023



W. Trey Merck, Attorney-at-Law
SC Bar No. 13641
302 Mt Olivet Road
Six Mile, South Carolina 29682
(864) 883-6060

YOU WILL PLEASE TAKE NOTICE that the Respondent hereby moves for an Order for Extension of Time to file Respondent's Initial Brief and Designation of Matter. Respondent needs additional time because of the holidays and because Appellant has addressed a number of issues, whether they have merit or not, that require general research and legal research in order to be properly addressed by Respondent.

Therefore, Respondent requests an ORDER allowing an Extension of Time allowing Respondent an additional sixty (60) days to file her Initial Brief and Designation of Matter.

For the foregoing reasons, Respondent respectfully requests that her Motion for Extension of Time be GRANTED.

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CERTIFICATE OF MAILING

Motion for Extension of Time

The undersigned hereby certifies that he placed true and accurate copies of the Document(s) named above to the Addressee(s) named below on the Date stated below in an envelope with prepaid first-class U.S. postage thereon and delivered the same to the U.S. Postal Service.

Clerk
SC Court of Appeals
Jenny Abbott Kitchings
P.O. Box 11629
Columbia, SC 29211

Jirair Baghdassarian
2580 La Cara Avenue
Las Vegas, NV 89121

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December 19, 2023

By email to ctappfilings@sccourts.org and First-Class Mail to:

Clerk
The South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Jirair Baghdassarian v. Judy Tupolo*
Appellate Case No. 2022-001785

Dear Clerk:

In regard to this matter, please find enclosed for filing a Motion for Extension of Time, along with a Certificate of Mailing.

I paid a Motion fee of \$50.00 when I filed this Motion previously and it was preliminary, so if you see fit, please waive any additional filing fee. If you do not agree to waive it, please let me know, and I will send a check by mail.

Also, please return the original death certificate to me since that document was only part of my Motion to Dismiss, which was denied.

Please contact me if you have any questions about these documents or this letter.

Respectfully submitted,



W. Trey Merck

WTM/vm

Attachments/Enclosures

cc: Jirair Baghdassarian