

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

69396

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Cynthia Graham Howe, Master in Equity

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CASE NO. 2008-CP-26-7941

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John Sherrill and Estate of Gaye Marie Reynolds..... Appellants

vs.

Gary Moore and Robert Moore ..... Respondents

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NOTICE OF MOTION AND MOTION TO EXTEND  
TIME TO FILE APPELLANTS' INITIAL BRIEF  
AND DESIGNATION OF MATTER

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YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants, moves this Court for an Order extending the time to file Appellants' Initial Brief and Designation of Matter in the captioned case, The basis of this Motion is that Appellants' counsel has numerous scheduling conflicts which have delayed preparation of the Brief.

WHEREFORE, Appellants request this Court issue its Order allowing an additional thirty (30) days to file the Appellants' Initial Brief and Designation of Matter in the above-captioned case, thus extending the time of filing until September 11, 2013.

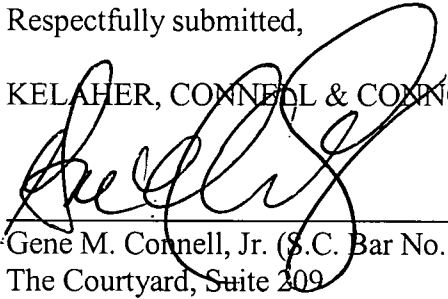
**RECEIVED**

AUG 12 2013

**SC Court of Appeals**

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.



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Gene M. Connell, Jr. (S.C. Bar No. 1358)

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Surfside Beach, South Carolina 29587-4547

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**Attorneys for Appellants**

August 7, 2013

Surfside Beach, South Carolina.

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Cynthia Graham Howe, Master in Equity

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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., Attorneys at Law, and that she has served a **Notice of Motion and Motion to Extend Time to File Appellants' Initial Brief and Designation of Matter** on the Respondents, through their attorneys of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

Kimberley Campbell  
Attorney at Law  
P. O. Box 760  
Murrells Inlet, SC 29576

Cheevin T. "Lex" Gardner  
Gardner Law Office  
5400 Hwy. 17 South  
Myrtle Beach, SC 29575

DATE OF MAILING: August 9, 2013

*Shelia Y. McCumbee*  
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,  
this 9th day of August, 2013

*[Signature]*  
Notary Public for South Carolina  
My Commission Expires: 2-17-19

**RECEIVED**

AUG 12 2013

**SC COURT OF APPEALS**

**KELAHER, CONNELL & CONNOR, P.C.**

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

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SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER\*  
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L. SIDNEY CONNOR, IV  
LISA POE DAVIS

\* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

August 7, 2013

Jenny A. Kitchings, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: John Sherrill as Personal Representative of the Estate of Gaye Marie Reynolds v.  
Gary Moore, Robert Moore and Steven W. Sessions  
Appellate Case No. 2013-001433  
C/A No. 2008-CP-26-7941  
Our File No. 2002-0579C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of our Notice of Motion and Motion to Extend Time to File Appellants' Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,

  
Gene M. Connell, Jr.

**RECEIVED**

AUG 12 2013

GMC,Jr.:sm

Enclosures

**SC Court of Appeals**

cc w/enc.: Kimberley Campbell, Esquire  
Cheevin T. "Lex" Gardner, Esquire  
John L. Sherrill, Esquire