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**Apr 04 2024**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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**APPEAL FROM THE FLORENCE COUNTY  
COURT OF COMMON PLEAS**

The Honorable H. Steven DeBerry, IV  
Civil Action Number: 2020CP2101817

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Appellate Case No.: 2023-001713

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Barbara L. Sarb ..... Respondent/Appellant,

vs.

Julie W. Phillips and Joseph M. Phillips ..... Appellant(s)/Respondent(s).

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**RESPONDENT/APPELLANT’S MOTION TO EXTEND DEADLINE TO SERVE AND  
FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

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Respondent/Appellant, Barbara Sarb, hereby moves, pursuant to Rule 263(b), SCACR, for a thirty (30) day extension of time to file its initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are as follows:

1. The deadline for filing the above-referenced documents is currently April 4, 2024.
2. This is the first extension that Respondent/Appellant has sought in this appeal.
3. Such extension is necessary in order to allow counsel to fully and adequately prepare Respondent/Appellant’s initial brief and designation of matter to be included in the record on appeal, in light of the undersigned’s current workload.

4. This appeal includes the consolidation of two appeals from a four-day jury trial and therefore requires a substantial amount of time to fully brief the issues.

WHEREFORE, Respondent/Appellant prays for an order extending the time in which to serve and file Respondent/Appellant's initial brief and designation of matter to be included in the record on appeal to May 6, 2024.<sup>1</sup>

Respectfully Submitted,

*s/ Valerie Garcia Giovanoli*

Valerie Garcia Giovanoli (SC Bar No. 102524)

Fiona R. Reed (SC Bar No. 104732)

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*Attorney for Barbara Sarb*

April 4, 2024  
Columbia, South Carolina

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<sup>1</sup> Thirty days from the current deadline is May 4, 2024 which falls on a Saturday.

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

H. Steven DeBerry, IV, Circuit Court Judge

Appellate Case No. 2023-001713  
Common Pleas Case No. 2020-CP-21-01817

Barbara L. Sarb, Respondent-Appellant,

v.

Julie W. Phillips and Joseph M. Phillips, Appellants-Respondents.

PROOF OF SERVICE

I certify that I have served Respondent-Appellant's Motion to Extend Deadline to Serve and File Initial Brief and Designation of Matter to be Included in the Record on Appeal on Julie W. Phillips and Joseph M. Phillips by emailing a copy to their attorneys of record, Edward A. Love and Robert T. King, on April 4, 2024, utilizing their email addresses listed in AIS as follows:

[elove@kingandlove.com](mailto:elove@kingandlove.com)

[rking@kingandlove.com](mailto:rking@kingandlove.com)

April 4, 2024

*s/ Valerie Garcia Giovanoli*  
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