

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

William E. Lawson, Special Referee

CASE NO. 2011-CP-26-4758

69447

Monroe E. Cook and Lynn S. CookeAppellants

vs.

Nealy Lynn Taylor..... Respondent

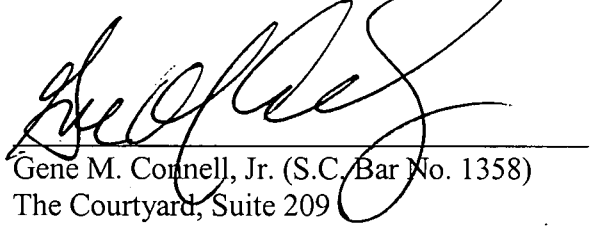
NOTICE OF MOTION AND MOTION TO EXTEND
TIME TO FILE APPELLANTS' INITIAL BRIEF AND
DESIGNATION OF MATTER

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 the undersigned took this file over only after a notice of appeal was filed by Appellants' prior counsel and did not receive the entire file until the middle of July. Since receiving the file, the undersigned counsel has had numerous scheduling conflicts which have delayed review of the record and preparation of a proper Brief.

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AUG 16 2013
SC Court of Appeals

WHEREFORE, Appellants' counsel respectfully requests 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 20, 2013.

KELAHER; CONNELL & CONNOR, P.C.



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

The Courtyard, Suite 209

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Attorney for Appellants

August 15, 2013
Surfside Beach, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Court of Common Pleas

William E. Lawson, Special Referee

CASE NO. 2011-CP-26-4758

Monroe E. Cook and Lynn S. CookeAppellants

vs.

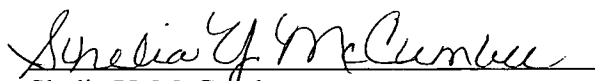
Nealy Lynn Taylor..... Respondent

PROOF OF SERVICE

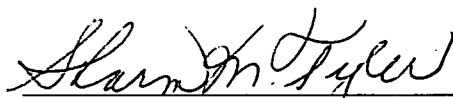
PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served a **Notice of Motion and Motion to Extend Time to File Appellant's Initial Brief and Designation of Matter**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

Phillip C. Thompson, Esq.
Thompson & Henry, P.A.
P. O. Box 1740
Conway, SC 29528

DATE OF MAILING: August 15, 2013


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 15th day of August, 2013.


Notary Public for South Carolina
My Commission Expires: 2-25-19

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SC COURT of Appeals

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

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LISA POE DAVIS

* OF COUNSEL

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238-5648

FAX: 238-5050

August 15, 2013

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

Re: *Monroe E. Cook and Lynn S. Cook v. Nealy Lynn Taylor*
Appellate Case No. 2013-000926
Our File No. 2013-0111C

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.

GMC,Jr.:sm
Enclosures

cc w/enc.: Phillip C. Thompson, Sr., Esquire
Monroe E. and Lynn S. Cook

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AUG 16 2013

SC Court of Appeals