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Jun 17 2024

SC Court of Appeals

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June 17, 2024

REQUEST FOR ADDITIONAL TIME TO COMPLETE MY FINAL BRIEF

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:

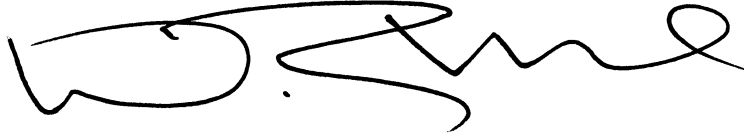
I am respectfully requesting an extension of time to finalize my Final Brief because a proper Record on Appeal has not been filed by the Appellant, and the current deadline for me to file my Final Brief is June 24, 2024. The Record on Appeal that was sent to me does not contain an Index, and it is not page-numbered. I cannot make the proper references in my Final Brief without a proper Record on Appeal.

As I previously informed the Court of Appeals, I am attending training from July 15, 2024 through August 2, 2024. This training is in Wyoming at the Gerry Spence Trial School, therefore I will not be able to work on the Final Brief during this time. If a proper Record on Appeal is forwarded to me soon, I should have enough time to complete it before I depart, however with no assurance that the Record on Appeal will be completed, I have to ask for enough time to return to work and complete the Final Brief.

Therefore, I am respectfully requesting until 20 days after I return, or August 26, 2024, to file the Respondent's Final Brief. Should I end up with 20 days before I leave to complete it, I should not need any additional time, and I will promptly get it filed and sent to the Court of Appeals. However, out of an abundance of caution, I have to make this request.

I very much appreciate your consideration of this request. Please also let me know if I need to pay a filing fee for this Request/Motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Trey Merck'. The signature is fluid and cursive, with a large initial 'W' and a long, sweeping tail.

W. Trey Merck
Attorney for Respondent, Judy Tupolo

WTM/vm

cc: Jirair Baghdassarian, Appellant
2580 La Cara Avenue
Las Vegas, Nevada 89121