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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

The Honorable Bentley D. Price
Circuit Court Judge

Appellate Case No. 2024-000350

Michele Graham,.....Appellant,

v.

Mark Ciaburri and Adrienne T. Ciaburri, Respondents.

**MOTION FOR EXTENSION OF TIME FOR RESPONDENTS TO SERVE AND FILE
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

COME NOW the above-named Respondents, who hereby request a thirty (30) day extension of time to serve and file their Initial Brief and Designation of Matter upon the Appellant, respectfully showing as follows:

1. The undersigned requested and received a first extension of time to respond to file their Initial Brief and Designation of Matter.

2. Pursuant to Rule 240, SCACR, the undersigned attorney, hereby submits this second request for a thirty (30) day extension as set forth herein. As grounds for this Motion, the undersigned would show that several matters were referenced in Appellant’s brief that were not part of the initial hearing record and that additional time is necessary to fully review the

proceedings in preparation for handling this appeal. Furthermore, the undersigned counsel and staff will be on vacation for part of this month and need additional time for the same.

3. This motion was provided to the Appellant at the time of filing. The undersigned does not believe that additional communication with the *pro se* Appellant would serve any useful purpose in resolving this matter.

WHEREFORE, the Respondents respectfully request that this Court issue an Order granting them a thirty (30) day extension of time to serve and file their Initial Brief and Designation of Matter, making it due on August 19, 2024.

Respectfully submitted,

S/ Edward R. Corvey, III
Edward "Ted" R. Corvey, III
SC BAR No: 101454
815 Savannah Highway, Suite 201
Charleston, South Carolina, 29405
P: 843-625-8600
F: 843-625-8601
Ted@corveylawfirm.com
Attorney for Respondents

July 2, 2024
Charleston, South Carolina

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PROOF OF SERVICE

I, Kyra McMillan, hereby certify that I have served the *Motion for Extension of Time for Respondents to Serve and File Initial Brief and Designation of Matter to be Included on Record of Appeal* via e-mail address and U.S. Mail on July 2, 2024, on the following recipient:

Michele Graham – Appellant
michele.graham0318@gmail.com

1661 Babington Way
Mount Pleasant, SC, 29464

Respectfully Submitted,

S/ Kyra McMillan

Kyra McMillan

815 Savannah Highway, Suite 201

Charleston, South Carolina, 29405

P: 843-625-8600

F: 843-625-8601

CORVEY LAW FIRM

July 2, 2024
Charleston, South Carolina