

In The South Carolina Court of Appeals On Appeal From the Kershaw County
Court of Appellate Case No: 2024-000679

Joseph and Lauren Jaco,
Respondent,
v.
J.N. Green and Associates et. Al.

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Oct 04 2024

SC Court of Appeals

Appellant.

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

1. The Appellant's Initial Brief and Designation of Matter is due to be served and filed today, October 4, 2024..
2. Counsel, who works and resides in Greenville, South Carolina, is requesting a thirty day extension to file Appellant's Initial Brief inasmuch as, due to the effects of Hurricane Helene, Counsel's home and office was without electricity for six days beginning on September 27th, 2024, and remained without internet access until after 5:00 p.m. on today October 4, 2024. Counsel has therefore been unable to complete Appellant's Initial Brief and is also faced with an extraordinary backlog of work due to the effect of the outages.
3. This motion is not made for the purpose of delay. Rather, it is necessary to ensure that the Appellant can adequately prepare and provide a complete and thorough Initial Brief.
4. Therefore, the Appellant requests an extension of time until November 4, 2024, to file and serve Appellant's Initial Brief and Designation of Matter. The Appellant also requests that all timelines be held in abeyance until a decision has been made by this Court on this Motion.

Respectfully submitted,
Turner Law, LLC

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October 4, 2024
Greenville, South Carolina