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Oct 10 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

The Honorable Thomas L. Hughston, Jr.

Appellate Case No.: 2024-000632
Case No.: 2020-CP-33-00277

Bevance Lynch Respondent,

vs.

Bertha E. Dunham Appellant.

**MOTION FOR AN EXTENSION OF TIME /
PERMISSION TO FILE OUT OF TIME**

Pursuant to Rule 240 of the South Carolina Appellate Court rules, Respondent respectfully requests permission to file his Initial Brief of Respondent and designation of Matter to be Included on the Record on Appeal contemporaneous with the filing of this motion. The undersigned is a solo practitioner and has been transitioning into a new office while also dealing with a personal, private family matter out-of-state. This request is made with sincere apology of the undersigned who believes this appeal should be decided on the merits with the benefit of Respondent's position considered.

October 10, 2024

/s/ J. Jakob Kennedy
J. Jakob Kennedy (S.C. Bar No. 72619)
KENNEDY LAW OFFICE, LLC
109 East Dozier Street
Post Office Box 925
Marion, SC 29571
(843) 423-5555
Attorney for Respondent

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PROOF OF SERVICE

I hereby certify that I have served the foregoing **MOTION FOR AN EXTENSION OF TIME / PERMISSION TO FILE OUT OF TIME** upon counsel for the Appellant, Paul B. Ferrara, III, who is a lawyer admitted to practice law in South Carolina by using his primary e-mail address of paul@ferraralawfirm.net as listed in the Attorney Information system (AIS). A copy of the e-mail is attached on the next page.

October 10, 2024

/s/ J. Jakob Kennedy
J. Jakob Kennedy (S.C. Bar No. 72619)
KENNEDY LAW OFFICE, LLC
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Post Office Box 925
Marion, SC 29571
(843) 423-5555
Attorney for Respondent

From: Jake Kennedy jake@kennedysc.com 
Subject: Appellate Case No.: 2024-000632 Lynch v. Dunham
Date: October 10, 2024 at 11:42 AM
To: Paul Ferrara paul@ferraralawfirm.net

JK

Paul - please see the attached: (1) Motion for Extension of Time; (2) Respondent's Designations of Matter to be Included in the Record on Appeal; and (3) Initial Brief of Respondent. This email is being sent to your AIS registered email and for the purposes of serving these documents in compliance with Supreme Court Order (2020-000447) section (d)(1).

Motion for Extension of Time.pdf



Respondent's Designation of
Matter.pdf



Initial Brief of Respondent.pdf



Jake Kennedy
Attorney

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