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Mar 27 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Debra R. McCaslin, Circuit Court Judge

Appellate Case No. 2022-000597

Case No. 2019-CP-32-01442

Suzan Garland, Respondent,

v.

Robert Cade, Christy Cade, and Roger Singleton Defendants.

of whom

Robert Cade and Christy Cade are the Appellants,

and Roger Singleton is a Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE RETURN
OF RESPONDENT SUZAN GARLAND**

Respondent Suzan Garland moves this Court for an order granting an extension of time for Respondent to serve and file the Return in the above-captioned action.

Currently, Respondent's Return is due on March 31, 2025. The undersigned party requests an extension of time of ten days to file and serve the Return. The

additional time is necessary because of the scheduling commitments of Respondent Garland's counsel.

If the Motion for Extension is granted as proposed, the new deadline for the Final Brief will be April 10, 2025. Respondent has attempted to consult with Appellants' counsel, S. Jahue Moore, Esquire, but he has not heard back.

s/ Michael J. Polk
H. Freeman Belser [SC Bar No. 72403]
Michael J. Polk [SC Bar No. 6936]
Creston W. Brown [SC Bar No. 104086]
Belser Law Firm, PA
1325 Park Street, Suite 300
Columbia, South Carolina 29201
Post Office Box 96 (29202)
(803) 929-0096
Attorneys for Respondent

March 27, 2025

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PROOF OF SERVICE

The undersigned certifies that this 27th day of March, 2025, he caused to be served the Respondent Suzan Garland’s **Motion for Extension of Time to File Return of Respondent Suzan Garland** via electronic mail addressed to attorneys of record for Appellants Robert Cade and Christy Cade: S. Jahue Moore and John C. Bradley, Jr., Moore Bradley Myers, P.A., *jake@mbmlawsc.com; john@mbmlawsc.com*; and attorneys of record for Respondent Roger Singleton: Thomas F. Dougall, and Michal Kalwajtys, Dougall & Collins, *tom.dougall@gmail.com; mkalwajtys@brblegal.com*.

[signature on following page]

s/ Michael J. Polk

H. Freeman Belser [SC Bar No. 72403]

Michael J. Polk [SC Bar No. 6936]

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Attorneys for Respondent Suzan Garland

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Via Regular Mail

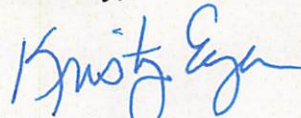
Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Suzan Garland v. Robert Cade and Christy Cade
Appellate Case No. 2022-000597

Dear Ms. Kitchings:

Please find enclosed our firm's check in the amount of \$50.00 representing the fee for filing Respondent Suzan Garland's Motion for Extension of Time to File Return of Respondent Suzan Garland which was e-mailed to you in the above referenced matter.

Sincerely,



Kristy Egan
Paralegal

Enclosure

cc: *Without Enclosure, Via E-Mail:*
Thomas Dougall, Esq. (tom.dougall@gmail.com)
Michael Kalwajtys, Esq. (mkalwajtys@brblegal.com)
S. Jahue Moore, Esq. (jake@mbmlaw.sc.com)
John C. Bradley, Jr. (john@mbmlawsc.com)