

RECEIVED

Aug 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Circuit Court Judge

Case No. 2022-CP-3202217

Dennis Gilpatrick.....Appellant,

v.

Gregory Lucas.....Respondent

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

Pursuant to Rule 240, *SCACR*, Appellant, by and through undersigned counsel, Rolf M. Baghdady, respectfully moves for an extension of the time in which to serve and file Appellant's Initial Brief and Designation of Matters to be included in the Record on Appeal. This is Appellant's first request for an extension of time.

The grounds for this motion are as follows:

1. The Order was received on July 30, 2025. The Notice of Appeal was filed on August 11, 2025 in the Court of Common Pleas in Lexington County and this Court.
2. No transcript of the proceedings need be ordered because, by agreement of Respondent's counsel, the proceedings have already been transcribed, making Appellants' Initial Brief and Designation of Matters to be included in the Record on Appeal due on September 10, 2025.
3. Appellant respectfully requests an extension of thirty (30) days, up to and including

the date of October 10, 2025, to file the Initial Brief and Designation of Matters to be included in the Record on Appeal.

4. This extension is not sought for purposes of delay and will not prejudice the Respondent. The additional time is necessary to ensure a thorough and complete presentation of the issues on appeal.
5. Respondent's counsel consents to this motion.

WHEREFORE, Appellant respectfully requests that this Court grant an extension of time to file the Initial Brief and Designation of Matters to be included in the Record on Appeal up to and including the date of October 10, 2025. I am notifying counsel for Respondent by copy of this motion.

August 21, 2025

s/ Rolf M. Baghdady
Rolf M. Baghdady / SC Bar # 0464
Rolf M. Baghdady, P.A.
118 Cobblestone Court
Chapin, S.C. 29036-9705
(803) 345-7653
E-mail: rolf@rolfbaghdady.com
Attorney for Appellant

Other counsel of record:
Theodore von Keller
P.O. Box 4216
Columbia, S.C. 29240
Attorney for Respondent Gregory Lucas

RECEIVED

Aug 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Circuit Court Judge

Case No. 2022-CP-3202217

Dennis Gilpatrick.....Appellant,

v.

Gregory Lucas.....Respondent

PROOF OF SERVICE

I certify that I have served the MOTION FOR EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL on Gregory Lucas by sending a copy via e-mail to his attorney of record, Theodore von Keller, at ted@crawfordvk.com on August 21, 2025.

August 21, 2025

s/ Rolf M. Baghdady
Rolf M. Baghdady / SC Bar # 0464
Rolf M. Baghdady, P.A.
118 Cobblestone Court
Chapin, S.C. 29036-9705
(803) 345-7653
E-mail: rolf@rolfbaghdady.com
Attorney for Appellant