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Jan 16 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
Case No. 2022-CP-32-02217

Appellate Case No.: 2025-001607

Dennis Gilpatrick Apellant
v.

Gregory Lucas Respondent

**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL
(FIRST SUCH REQUEST)**

Respondents, by and through their undersigned counsel, hereby move pursuant to Rule 263(b), SCACR, for an extension of the time in which to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. Upon information and belief, Respondents' initial brief is currently due to this Court on January 23, 2026.
2. Counsel respectfully requests an extension of time in which to file the brief due to an exceptionally heavy court schedule and the press of other professional obligations, which have limited counsel's ability to complete said brief within the current deadline.
3. Respondents' counsel believes there is good cause to grant the requested extension of this deadline.
4. Opposing counsel consents to this request.

WHEREFORE Respondents pray for an order extending the time in which to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

RESPECTFULLY SUBMITTED
CRAWFORD & VON KELLER, LLC

s/ Jason M. Hunter

Theodore von Keller S.C. Bar No.5718

Post Office Box 4216

Columbia, South Carolina 29204

Telephone 803-790-2626

ATTORNEYS FOR RESPONDENTS

Columbia, SC
January 16, 2026

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Dennis GilpatrickApellant

v.

Gregory Lucas.....Respondent

PROOF OF SERVICE

I certify that I served the foregoing Respondent’s Motion for Extension of Time to Serve and File Respondent’s Initial Brief and Designation of Matter to be included in Record of Appeal (First Such Request) in this case by depositing a copy of it in the United States Mail, postage prepaid, on January 6, 2026, addressed to his attorney of record, Rolf M. Baghdady, Esquire, Rolf M. Baghdady, P.A., 118 Cobblestone Court, Chapin, SC 29036.

January 16, 2026

s/Theodore von Keller

THEODORE VON KELLER , SC BAR NO. 5718

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ATTORNEY FOR RESPONDENT



CRAWFORD & VON KELLER, LLC
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January 16, 2026

Via Email and Regular Mail

SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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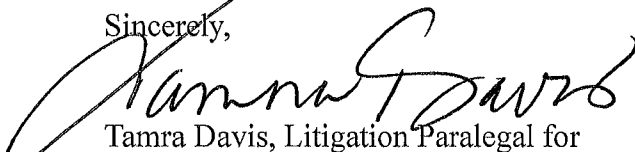
RE: Dennis Gilpatrick vs. Gregory Lucas
Case No.: 2022-CP-32-02217
Appellate Case No.: 2025-001607
Our Case No. 0064-22-0001

To whom it may concern:

Enclosed please find Respondent's Motion for Extension of Time to Serve and File Respondent's Initial Brief in the above-referenced matter. Please file accordingly. I have also enclosed a check in the amount of \$50.00 for your filing fee.

Please advise if anything further is required.

Sincerely,


Tamra Davis, Litigation Paralegal for
Theodore von Keller

TVK/tdd

Cc: Rolf M. Baghdady, Esquire
Rolf M. Baghdady, P.A.
118 Cobblestone Court
Chapin, SC 29036

WE ARE A DEBT COLLECTOR. THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.



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