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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, III, Special Circuit Court Judge

Case No. 2011-CP-46-4281

Ingris Janet Calcagno,

Respondent,

v.

Richard T. Wynn

Appellant.

APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Appellant, Richard T. Wynn, pursuant to Rule 240 of the South Carolina Appellate Court Rules, hereby respectfully requests this Court of Appeals to grant him a thirty (30) day extension of time in which to file his Initial Brief. With this extension, the Initial Brief will be due on December 20, 2013. As grounds for this Motion, undersigned counsel avers that he and his firm were hired on November 19, 2013 to represent appellant in this appeal and need additional time to prepare the initial brief. Undersigned Counsel has attempted to confer with counsel for Respondents concerning this request for extension, but has been unable to reach him.

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This 20th day of November, 2013



Stephen M. Cox
S.C. Bar No. 12263

ROBINSON, BRADSHAW & HINSON, P.A.
Attorneys for Appellant
140 East Main Street, Suite 420
Post Office Box 12070
Rock Hill, South Carolina 29731
(803) 325-2900

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PROOF OF SERVICE

I hereby certify that the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** has been served upon the counsel for the Respondents to this action via U.S. Mail in an envelope addressed as follows:

Robert J. Reeves
Post Office Box 1297
Fort Mill, South Carolina 29716

This the 20th day of November, 2013.



Stephen M. Cox