

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

70654

William E. Lawson, Special Referee

CASE NO. 2011-CP-26-4758

Monroe E. Cook and Lynn S. CookeAppellants

vs.

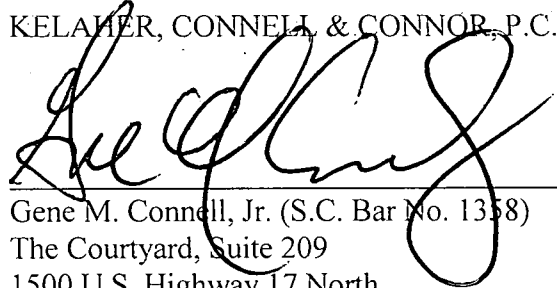
Nealy Lynn Taylor..... Respondent

NOTICE OF MOTION AND MOTION
FOR EXTENSION OF TIME TO ANSWER RESPONDENT'S
MOTION TO STRIKE

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants, moves this Court for an extension until December 22, 2013, to answer the allegations of Respondent's Motion to Strike.

Respectively submitted,

KELAHER, CONNELL & CONNOR, P.C.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U.S. Highway 17 North
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Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
(843) 238-5050 (facsimile)
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Attorney for Appellant

RECEIVED
DEC 09 2013
SC Court of Appeals

December 6, 2013
Surfside Beach, South Carolina

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Nealy Lynn Taylor..... Respondent

PROOF OF SERVICE

PERSONALLY appeared before me, Mary F. O'Donnell, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served a **Notice of Motion and Motion For Extension of Time to Answer Respondent's Motion to Strike** on the Respondents, through their attorneys of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

Phillip C. Thompson, Esq.
Thompson & Henry, P.A.
P. O. Box 1740
Conway, SC 29528

DATE OF MAILING: December 6, 2013

Mary F. O'Donnell
Mary F. O'Donnell

SWORN AND SUBSCRIBED before me,
this 6 day of December, 2013.

Marie P. Freeman
Notary Public for South Carolina
My Commission Expires: 6/24/14

RECEIVED

DEC 09 2013

SC Court of Appeals

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
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LISA POE DAVIS

* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

December 6, 2013

Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Monroe E. Cook and Lynn S. Cook v. Nealy Lynn Taylor*
Appellate Case No. 2013-000926
Our File No. 2013-0111C

Dear Ms. Kitchings:

I am writing you in regard to the above captioned matter. I was served with a Motion to Strike on November 26, 2013. Our word processor has been out of the office due to an extended illness in her family. I am requesting that the Court give me until December 22 to respond to the Motion to Strike. I enclose a check in the amount of \$25.00 and a Motion. Please file the Motion and return a clocked copy to me in the envelope provided for your convenience.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:fo
Enclosures

cc w/enc.: Phillip C. Thompson, Sr., Esquire
Monroe E. and Lynn S. Cook