

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

D. Garrison Hill, Circuit Court Judge
Robert E. Hood, Circuit Court Judge

70603

Case No. 2011-CP-23-04585
Appellate Case No. 2013-000666

James L. Dawkins and Delphine Dawkins,Appellants,

v.

Troy Lee Watts, Jr.,Respondent.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER

Counsel for the Respondent, hereby moves for an extension to serve and file the
Respondent's Initial Brief and Designation of Matter in the present case.

Counsel for Respondent initially made a request for an extension on November 1, 2013 with
the Court granting an extension through December 4, 2013. The granting of that extension took
place on November 6, 2013.

Unfortunately, my trial schedule has forced my request for an extension. For example, I
tried and concluded a case on or about October 8, 2013. I then tried a case that was concluded on or
about October 18, 2013. I then tried yet another case which was concluded on or about October 25,

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2013. I then tried another case which was concluded on or about October 30, 2013.

Furthermore, I am to be on vacation during the week of December 2, 2013 through December 6, 2013.

Thereafter, I am scheduled to try two cases during the week of December 9, 2013.

For all of the above reason, Counsel for Respondent requests an extension of time to file the respondent's initial brief and designation of matter.

Respondent further moves that the time for filing these documents be held in abeyance pending the decision and ruling by the Court on this Motion.

I SO MOVE.



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Counsel for Respondent

November 29, 2013

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

D. Garrison Hill, Circuit Court Judge
Robert E. Hood, Circuit Court Judge

Case No. 2011-CP-23-04585
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James L. Dawkins and Delphine Dawkins,Appellants,

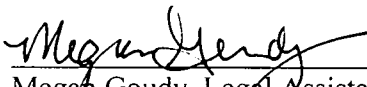
v.

Troy Lee Watts, Jr.,Respondent.

PROOF OF SERVICE

I certify that I served the Respondent's Initial Brief and Designation of Matter on James L. Dawkins and Delphine Dawkins by depositing a copy of the same in the United States Mail, first class postage prepaid, addressed to their attorney's of record, Donald R. Moorehead, Esq. at his office at 880 South Pleasantburg Drive, Suite A-3, Greenville, SC 29607 and, Cynthia B. Patterson, Esq. at P.O. Box 6786, Columbia, SC 29260 on December 4, 2013.

December 4, 2013


Megan Goudy, Legal Assistant to
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November 29, 2013

The Honorable Jenny Abbott Kitchings
Clerk for the South Carolina Court of Appeals
Po Box 11629
Columbia, SC 29211

RE: Case Name: James L. Dawkins and Delphine Dawkins v. Troy Lee Watts, Jr.
Appellate Case No.: 2013-000666

Dear Ms. Kitchings:

Please find enclosed an original and seven copies of the Respondent's request for an extension of time to serve and file the Respondent's Initial Brief and Designation of Matter as well as corresponding certificates of service.

Also, please find enclosed the \$25.00 filing fee associated with this matter.

Just as important, please find enclosed, two stamped, self-addressed envelopes.

I would appreciate you filing the originals of these documents, clocking the additional copy, and returning the same to me in the enclosed, self-addressed, stamped envelope provided for your convenience.

Furthermore, if this motion is granted, I would appreciate your sending me a copy of the order granting the same in the additional enclosed, self-addressed, stamped envelope provided for your convenience.

Also, please note, that I am also moving to have the time to file the Respondent's Initial Brief and Designation of Matter to be held in abeyance pending your decision regarding this matter.

Please note, by copy of this letter, that I am placing all Counsel for Appellants on notice of my request.

As always, I thank you and your staff for all the help and assistance you repeatedly provide with regard to these matters.

Sincerely,



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Counsel for Respondent

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MKM/meg

Enclosures

cc: Donald R. Moorhead, Esq.
Cynthia B. Patterson, Esq.
Kathryn Beckenhauer