

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Cynthia Graham Howe, Master in Equity

CASE NO. 2008-CP-26-7941

RECEIVED
JAN 22 2014
SC Court of Appeals
7/043

John Sherrill and Estate of Gaye Marie Reynolds..... Appellants

vs.

Gary Moore and Robert Moore Respondents

NOTICE OF MOTION AND MOTION TO EXTEND
TIME TO FILE RECORD ON APPEAL

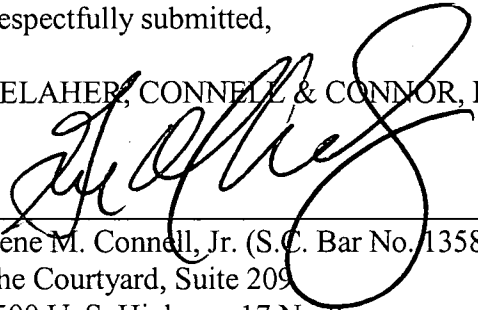
YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants, moves this Court for an Order extending the time for filing the Record on Appeal. The basis of this Motion is that when counsel received the Order denying Respondents' motion to strike certain items designated by Appellants to be included in the Record on Appeal such Order did not designate a date when the Record on Appeal would be due. Counsel anticipated he would receive an additional Order from the Court setting a date the Record on Appeal would be due to this Court. Upon checking his file, counsel realized no further Order and/or instruction had been received from the Court and called the Court. Counsel was advised he should file this Motion requesting an extension to file the Record on Appeal.

1-3
2-17

WHEREFORE, Appellants respectfully request this Court issue its Order allowing Appellants until February 15, 2014 to file the Record on Appeal.

Respectfully 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
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
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gconnell@classactlaw.net
Attorneys for Appellants

January 21, 2014
Surfside Beach, South Carolina.

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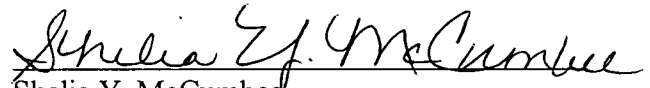
PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, 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 to Extend Time to File Record on Appeal** on the Respondents, through their attorneys of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

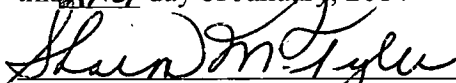
Kimberley Campbell
Attorney at Law
P. O. Box 760
Murrells Inlet, SC 29576

Cheevin T. "Lex" Gardner
Gardner Law Office
5400 Hwy. 17 South
Myrtle Beach, SC 29575

DATE OF MAILING: January 21, 2014


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 21st day of January, 2014


Notary Public for South Carolina
My Commission Expires: 2-25-19

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*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS

* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

January 21, 2014

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

Re: *John Sherrill as Personal Representative of the Estate of Gaye Marie Reynolds v. Gary Moore, Robert Moore and Steven W. Sessions*
Appellate Case No. 2013-001433
C/A No. 2008-CP-26-7941
Our File No. 2002-0579C

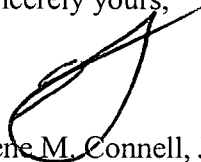
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of our Notice of Motion and Motion to Extend Time to File Record on Appeal and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

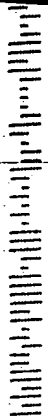
GMC,Jr.:sm
Enclosures

cc w/enc.: Kimberley Campbell, Esquire
Cheevin T. "Lex" Gardner, Esquire
John L. Sherrill, Esquire

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JAN 22 2014

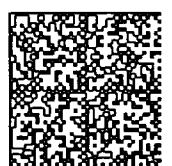
SC Court of Appeals



KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW
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SURFSIDE BEACH, SOUTH CAROLINA 29587

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



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SC Court of Appeals