

THE STATE OF SOUTH CAROLINA
In the Court of Appeals
Case Tracking No. 2013-2319

71223

APPEAL FROM LAURENS COUNTY
Civil Action No. 2012-CP-30-258
The Honorable Frank R. Addy, Circuit Court Judge

In the Matter of the Estate of Marion M. Kay

Edward D. Sullivan, as Personal Representative
of the Estate of Marion M. Kay Appellant/Cross-Respondent,

vs.

Martha Brown and Mary Moses Respondents/Cross-Appellants.

**MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF OF APPELLANT/CROSS- RESPONDENT**

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

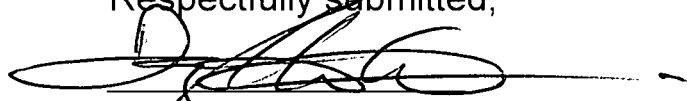
Pursuant to Rule 240, SCACR, Appellant/Cross-Respondent Edward
D. Sullivan, as Personal Representative of the Estate of Marion M. Kay
respectfully moves this Court for an Order granting him an extension of time
in which to file Initial Brief of Appellant/Cross-Respondent.

Counsel for Appellant/Cross-Respondent has been conscientious in
our efforts to prepare Appellant/Cross-Respondent's Initial Brief; however,
because of time constraints imposed by other obligations, counsel projects

we will require additional time to complete our brief. The current deadline is Tuesday, February 18, 2014. Appellant/Cross-Respondent requests a thirty (30) day extension, which would place the new deadline at March 20, 2014.

Appellant/Cross-Respondent greatly appreciates the Court's time, attention, and assistance with regard to this request.

Respectfully submitted,



Daryl G. Hawkins
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*Attorneys for Appellant-Cross-Respondent
Edward D. Sullivan, as Personal
Representative
of the Estate of Marion M. Kay*

Columbia, South Carolina
February 7, 2014

THE STATE OF SOUTH CAROLINA
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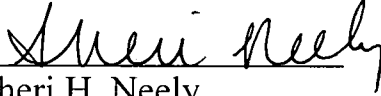
Martha Brown and Mary MosesRespondents/Cross-Appellants.

PROOF OF SERVICE

I hereby certify that I served the Motion for Extension of Time to File Initial Brief of Appellant/Cross-Respondent upon Respondents/Cross-Appellants Martha Brown and Mary Moses by placing a copy in the United States mail, postage prepaid, to counsel of record, John R. Ferguson, PO Box 286, Laurens, SC 29360 on February 7, 2014.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,


Sheri H. Neely

Paralegal

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February 7, 2014

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RE: Edward D. Sullivan, as Personal Representative of The Estate of Marion M. Kay
v. Martha Brown and Mary Moses
Case No. 2012-CP-30-00258

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the Appellant/Cross-Respondent's Motion for Extension of Time to File Initial Brief in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the required filing fee.

Please return a clocked-copy with our courier.

If you have any questions, please do not hesitate to call.

Very truly yours,



Sheri Neely
Legal Assistant

Enclosures

cc: John R. Ferguson