

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

Case No. 2013-002474

Catherine Virginia Cox,

Appellant,

v.

Kenneth L. Pinckney, Sr.,
And Stacy Marie St. Pierre,

Respondents.

MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN RECORD ON APPEAL

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FEB 04 2014

SC Court of Appeals

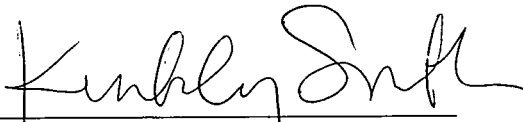
The Appellant would respectfully request a thirty (30) day extension of time within which to file the Initial Brief and the Designation of Matter to be Included in the Record on Appeal. These matters are due no later than January 31, 2014.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Respondent.

It is accordingly respectfully requested that the Appellant be granted a thirty (30) day extension of time in which to file the Appellant's Initial Brief and the Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

MOSS, KUHN & FLEMING, P.A.

By 

Kimberly L. Smith
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(843)524-3373
(843)524-1302 (FX)

Attorney for the Appellant

Beaufort, South Carolina
January 30, 2014

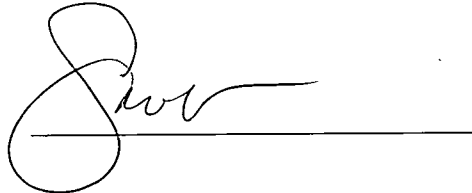
CERTIFICATE OF SERVICE

Undersigned certifies that the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Adam J. Neil, Esquire
Post Office Box 6648
Columbia, South Carolina 29260

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on January 30, 2014.

MOSS, KUHN & FLEMING, P.A.

A handwritten signature in cursive script, appearing to read 'A. Neil', is written over a horizontal line.

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SC Court of Appeals

LAW OFFICES

MOSS, KUHN & FLEMING, P.A.

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KIMBERLY L. SMITH
EVE M. FLEMING

*ALSO MEMBER OF GA BAR

January 30, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Catherine Virginia Cox v. Kenneth L. Pinckney, Sr. and Stacy Marie St. Pierre
Case No.: 2013-002474

Dear Mrs. Kitchings:

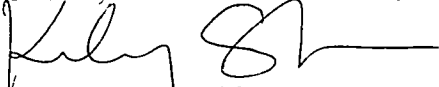
Enclosed please find the original and seven (7) copies of the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal, and Certificate of Service. I am also enclosing my firm's check in the amount of \$25.00 as the filing fee for this Motion.

Please file the enclosures and return one (1) clocked copy to me in the enclosed self-addressed stamped envelope.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.


Kimberly L. Smith

KLS:sr
Enclosures

cc: Adam J. Neil, Esquire (w/enclosure)

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FEB 04 2014

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