

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Case No. 2012CP3600484

Samantha Hendrix,

Appellant,

v.

Discover Bank

Respondent.

MOTION TO EXTEND TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL

The Appellant, Samantha Hendrix, by and through her undersigned counsel, respectfully submits this motion to extend time to file Appellant's initial brief and designation of matter to be included on appeal. Appellant would respectfully show that the Notice of Appeal was served January 14, 2014 and would otherwise have been due on February 13, 2014, since there was no hearing of record and no transcript was ordered. SCEMD reflected that, *inter alia*, Richland County, S.C. was closed on Thursday February 13, 2014 and Friday February 14, 2014 on account of the inclement weather, and that February 15, 2014 was a Saturday, February 16, 2014 a Sunday, and February 17, 2014 was Presidents' Day, so that this Motion is filed within the time

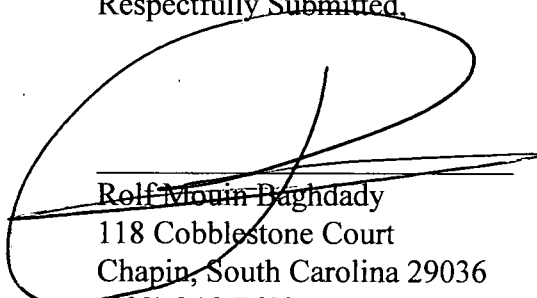
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the brief would otherwise have been due but not ahead of the time on account of the unexpected severe weather delays.

Wherefore, Appellant prays that the Court will extend the time to file the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal by 10 days to February 28, 2014, and for such other and further relief as may be just and proper.

Respectfully Submitted,

February 18, 2014



~~Rolf Mouni Baghdady~~
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Attorney for Appellant

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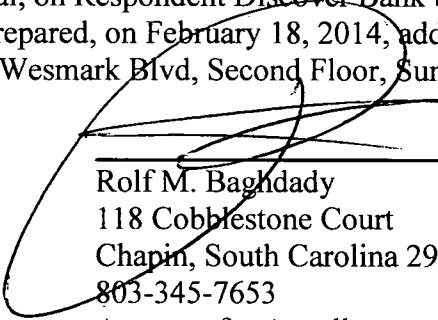
Discover Bank

Respondent.

PROOF OF SERVICE

I certify that I have served the motion to extend time to file initial brief and designation of matter to be included on appeal, on Respondent Discover Bank by depositing a copy of it in the United States Mail, postage prepared, on February 18, 2014, addressed to its attorney of record, Timothy Lee Griffith, 360 W Wesmark Blvd, Second Floor, Sumter, SC 29150.

February 18, 2014



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118 Cobblestone Court
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Attorney for Appellants

Other Counsel of Record:
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803-968-0609
Attorney for Respondent

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FEB 18 2014

SC Court of Appeals

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February 18, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29221

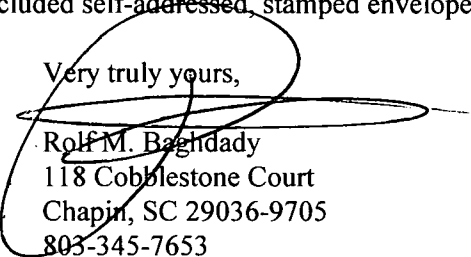
RE: Samantha Hendrix v. Discover Bank
Case No.: 2012CP3600484

Dear Ms. Kitchings:

Enclosed for filing is an original and seven copies of the motion to extend time to file initial brief and designation of matter be included on appeal. Along with a \$25.00 check for filing fees.

Please return a clocked copy in the included self-addressed, stamped envelope.

Very truly yours,


Rolf M. Baghdady
118 Cobblestone Court
Chapin, SC 29036-9705
803-345-7653
Attorney for Appellant

cc: Timothy Lee Griffith
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803-968-0609
Attorney for Respondent

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SC Court of Appeals

Office locations [www.rolfbaghdady.com / Offices.html](http://www.rolfbaghdady.com/Offices.html)
Admitted to Practice in South Carolina, Georgia, Florida, and New York