

THE STATE OF SOUTH CAROLINA  
In the South Carolina Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2012-CP-23-1971  
Appellant Case No. 2013-002367

Joyce Ann Campbell

Appellant,

v.

Barbara Gaines

Respondent.

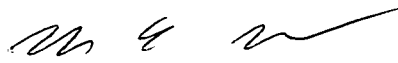
MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF  
AND DESIGNATION OF MATTER

Counsel for appellant hereby moves for an extension to serve and file Appellant's Initial Brief and Designation of Matter in the present action.

This request is made due to counsel's mother being hospitalized for a month and essentially bedridden for the last six weeks. Counsel has also been invited to try a case which is first up in the county of Laurens on March 17, 2014.

Counsel for Appellant further moves that the time limits regarding these matters be held in abeyance pending the decision and ruling by the court on this motion.

March 13, 2014

  
\_\_\_\_\_  
Marcus K. McGarr, Esq.  
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S.C. Bar No.: 011885  
108 Whitsett Street  
Greenville, S.C. 29601  
T: (864) 298-0089  
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Attorney for Appellant

Other Counsel of Record:

John R. Peace, Esq.  
John Robert Peace, P.A.  
PO Box 8087  
Greenville, SC 29604-8087  
T: (864) 298-0500  
F: (864) 271-3130  
Attorney for Respondent

**RECEIVED**

MAR 17 2014

**SC Court of Appeals**

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PROOF OF SERVICE

I certify the I have served the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter and corresponding Proof of Service on Barbara Gaines by depositing a copy of it in the United States Mail, postage prepaid, on March 13, 2014, addressed to her attorney of record, John R. Peace, Esq., John Robert Peace, P.A., PO Box 8087, Greenville, SC 29604-8087.

March 13, 2014



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Attorney for Appellant

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MAR 17 2014

**SC Court of Appeals**

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March 13, 2014

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

RE: Case Name: Barbara Gaines v. Joyce Ann Campbell  
Case # 2012-CP-23-1971  
Claim # 40-8536-882  
MKM File # 200.1077

Dear Ms. Kitchings:

Please find enclosed the original, and seven (7) copies of the following documents regarding the above referenced action:

1. A Motion for an Extension of Time to File the Appellant's Brief and Designation of Matter;
2. A Proof of Service; and,
3. A stamped, self-addressed envelope.

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

Just as important, please find enclosed, a draft in the amount of \$25.00 which represents the filing fee with regard to this matter.

Furthermore, please note that by copy of this letter I am placing counsel for plaintiff/respondent on notice that these documents have been filed with the court.

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

Sincerely,

MARCUS K. MCGARR, P.A.



Marcus K. McGarr

**RECEIVED**

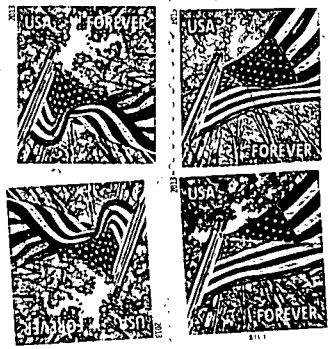
MAR 17 2014

**SC Court of Appeals**

MKM/meg  
Enclosures

cc: John R. Peace, Esq.  
Joyce Ann Campbell  
David Ashton

MARCUS K. McGARR, P.A.  
ATTORNEY AT LAW  
108 WHITSETT STREET  
GREENVILLE, SOUTH CAROLINA 29601



The Honorable Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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