

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

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

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MAR 17 2014

SC Court of Appeals

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, as well as the ongoing care and attention devoted by Appellant/Cross-Respondent to a sibling residing in a skilled-nursing facility, Counsel projects we will require additional time to complete our Initial Brief. The current deadline is Thursday, March 20, 2014. Appellant/Cross-Respondent respectfully requests a fifteen (15) day extension, which would place the new deadline at Friday, April 4, 2014.

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

RESPECTFULLY SUBMITTED,

LAW OFFICE OF DARYL G. HAWKINS, LLC

By: 

For: Daryl G. Hawkins
SC Bar No. 2844

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Columbia, SC 29201-2150
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(803) 733-3531 Ofc
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March 17, 2014

Attorneys for Appellant/Cross-Respondent

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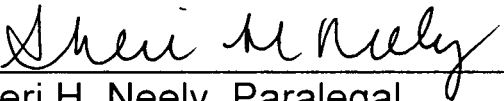
Edward D. Sullivan, as Personal Representative
of the Estate of Marion M. Kay Appellant/Cross-Respondent,

vs.

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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 March 17, 2014.



Sheri H. Neely, Paralegal
Law Office of Daryl G. Hawkins, LLC

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SC Court of Appeals

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