

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

M1756

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

POWER OF ATTORNEY

MAR 6 - 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. KayAppellant-Respondent,

vs.

Martha Brown and Mary Moses Respondents-Appellants.

**APPELLANT- RESPONDENT’S MOTION
TO EXCEED PAGE LIMIT**

TO THE HONORABLE JUDGES OF THE COURT OF APPEALS:

Pursuant to Rule 208(b)(5), SCACR, “principal briefs shall not exceed fifty (50) pages”. This rule further states that, upon motion, the appellate court may grant a party permission to exceed this limitation. Edward D. Sullivan, as Personal Representative of the Estate of Marion M. Kay respectfully requests this Court grant him leave to file and serve his principal brief which exceeds fifty (50) pages in length. Appellant-Respondent submits an expanded Final Brief is necessary due to the numerous issues in this case which causes the Brief to exceed fifty (50) pages. Appellant-Respondent estimates that the Final Brief will be between 50 and 60 pages.

Appellant-Respondent further submits Respondents-Appellants are not

prejudiced by the filing of an extended brief.

Appellant-Respondent greatly appreciates the Court's accommodation with regard to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Daryl G. Hawkins', written over a horizontal line.

Daryl G. Hawkins
LAW OFFICE OF DARYL G. HAWKINS, LLC
Post Office Box 11906
Columbia, SC 29211-1906
803.733.3531 – Tel
803.744.1949 – Fax

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

Columbia, South Carolina
March 31, 2014

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PROOF OF SERVICE

I hereby certify that I served the APPELLANT- RESPONDENT'S MOTION TO EXCEED PAGE LIMIT upon Respondents-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 31, 2014.

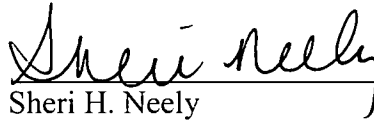
[SIGNATURE PAGE TO FOLLOW]

RECEIVED

MAR 31 2014

SC Court of Appeals

Respectfully submitted,

A handwritten signature in cursive script that reads "Sheri Neely". The signature is written in black ink and is positioned above the printed name.

Sheri H. Neely

Paralegal

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March 31, 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

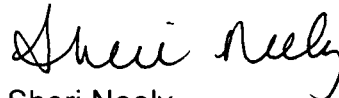
Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the Appellant/Respondent's Motion to Exceed Page Limit 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

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MAR 31 2014

SC Court of Appeals