

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas
Frank R. Addy, Jr., Circuit Court Judge
2013-002319

RECEIVED
APR 14 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

v.

Martha Brown and Mary Moses, Respondents/
Cross-Appellants

MOTION FOR EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF

The undersigned hereby moves the Court to grant him a
thirty (30) day extension of time to reply to the Initial
Brief of Appellant-Respondent on the following grounds:

JR7
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1. Appellant-Respondent served his brief late last
Friday afternoon after the undersigned had left his office, so
the undersigned effectively has less than the time allowed
under the rules to respond.

2. Appellate-Respondent's brief is 47 pages and includes
misstatements of fact, errors of law and matters not part of
the record below which will require the extra time sought to
address.

3. The undersigned, who is right-handed, has been
experiencing problems with his right hand which will result in
surgery next week. It is difficult for him to write and use

a keyboard in a normal fashion, and this is impeding his response.

COX, FERGUSON & WHAM, LLC
Attorneys for Cross-Appellants

By: _____

John R. Ferguson

John R. Ferguson
S.C. Bar No. 1987
107 W. Laurens St. - PO Box 286
Laurens, SC 29360
(864) 984-212
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April 10, 2014

JR7
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Edward D. Sullivan, as Personal Representative
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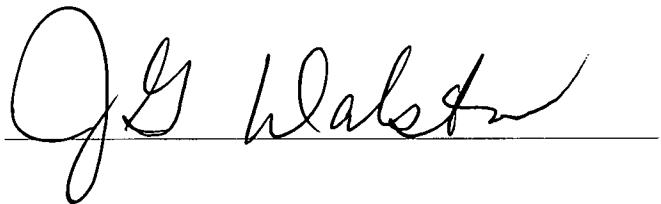
v.

Martha Brown and Mary Moses, Respondent/
Cross-Appellant

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox
Ferguson & Wham, LLC and that on the 10 day of April, 2014
she served the Motion for Extension of Time to File Initial
Reply Brief herein by depositing a copy of it in the United
States Mail, postage prepaid and addressed to:

Daryl G. Hawkins, Esq.
Attorney at Law
P.O. Box 11906
Columbia, SC 29211.



April 10, 2014

COX, FERGUSON & WHAM

ATTORNEYS AT LAW
107 E. Laurens St.
P.O. Box 286
LAURENS, SOUTH CAROLINA 29360-0286

W. REID COX, JR.
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ALLEN M. WHAM

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April 10, 2014

Office of the Clerk of Court
S.C. Court of Appeals
1015 Sumter St.
Columbia, SC 29201



APR 14 2014

Re: In the Matter of the Estate of Marion M. Kay, 2013-2319

SC Court of Appeals

Gentlemen:

Enclosed with this letter you will find an original and seven (7) copies of a Motion for Extension of Time to File Initial Reply Brief plus a check for \$ 25 for the filing fee. Please file the motion and send me a clocked copy in the enclosed envelope.

Thank you for your help.

Sincerely,

John R. Ferguson

JRF/wp
Encl.
CC: Daryl G. Hawkins, Esq.

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APR 1 4 2014

SC Court of Appeals

COX, FERGUSON & WHAM, LLC
ATTORNEYS AT LAW
107 E. LAURENS ST. - PO BOX 286
LAURENS, SC 29360

TO:

**OFFICE OF THE CLERK OF COURT
S.C. COURT OF APPEALS
1013 SUMTER ST
COLUMBIA SC 29201**