

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Case Tracking No. 2013-2319

12079

APPEAL FROM LAURENS COUNTY
COURT OF COMMON PLEAS

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

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
FOR EXTENSION OF TIME TO
FILE INITIAL REPLY BRIEF

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA
COURT OF APPEALS:

Pursuant to Rule 240, SCACR, Appellant-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 a Response to Respondent-
Appellants' Initial Brief.

RECEIVED
MAY 02 2014
SC Court of Appeals

Counsel for Appellant-Respondent has been ill and out of the office for the past week. Counsel received Respondent-Appellants' Initial Brief on April 29, 2014. The current deadline is May 5, 2014. Appellant-Respondent respectfully requests a ten (10) day extension, which would place the new deadline at May 15, 2014.

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

RESPECTFULLY SUBMITTED,

LAW OFFICE OF DARYL G. HAWKINS, LLC

By: C. Wilson Smith
For. Daryl G. Hawkins
SC Bar No. 2844

1331 Elmwood Avenue, Suite 305
Columbia, SC 29201-2150
Email: dgh@dghlaw.net
(803) 733-3531 Ofc
(803) 744-1949 Fax

May 2, 2014

Attorneys for Appellant/Cross-Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Case Tracking No. 2013-2319

APPEAL FROM LAURENS COUNTY
COURT OF COMMON PLEAS

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

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.

PROOF OF SERVICE

I certify that I served Appellant-Respondent's Motion for Extension of Time to File Initial Reply Brief via U.S. Mail upon:

John R. Ferguson, Esquire
Cox Ferguson & Wham LLC
PO Box 286
Laurens, SC 29360-0286

LAW OFFICE OF DARYL G. HAWKINS, LLC



Kimberly E. Harbison, Legal Assistant

May 2, 2014

RECEIVED

MAY 02 2014

SC Court of Appeals

TELEPHONE
(803) 733-3531

LAW OFFICE OF
DARYL G. HAWKINS, LLC
1331 Elmwood Avenue • Suite 305 (29201)
Post Office Box 11906
Columbia, South Carolina 29211

FACSIMILE
(803) 744-1949

May 2, 2014

The Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
PO Box 11629
Columbia, SC 29211-1629

RE: *In the Matter of the Estate of Marion M. Kay*
Edward D. Sullivan, as Personal Representative of
the Estate of Marion M. Kay, Appellant-Respondent v.
Martha Brown and Mary Moses, Respondents-Appellants
Laurens Co Circuit Court Appeals File No. 2012-CP-30-258
Laurens Co Probate Court File No. 2007-ES-30-208
SC Court of Appeals Tracking No. 2013-2319

Dear Ms. Kitchings:

Enclosed for filing with your office is the original and seven (7) copies of Appellant-Respondent's Motion for Extension of Time to File Initial Reply Brief in the above matter. I would appreciate your returning a clocked copy of me via our courier. I have included a check in the amount of \$25 to cover the cost of filing.

By copy of this letter to counsel for the Respondents-Appellants, I am herewith serving a copy of the above upon him.

Sincerely,



Kimberly E. Harbison
Legal Assistant to Daryl G. Hawkins

Enclosures
cc: John R. Ferguson, Esquire

RECEIVED

MAY 02 2014

SC Court of Appeals