

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

12174

Case Tracking No. 2013-2319

APPEAL FROM LAURENS COUNTY  
COURT OF COMMON PLEAS

RECEIVED

MAY 13 2014

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

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-Respondent,

vs.

Martha Brown and Mary Moses ..... Respondents-Appellants.

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APPELLANT-RESPONDENT'S MOTION  
FOR EXTENSION OF TIME TO  
FILE INITIAL REPLY BRIEF  
AND RELATED DESIGNATION OF MATTER  
TO BE INCLUDED ON APPEAL

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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 the Initial Reply Brief.

The current deadline to reply is May 15, 2014. Due to workload, travel requirements, other commitments and the complexity of the issues in this appeal, Counsel for Appellant-Respondent has been unable to devote the time and attention required to prepare a short and concise reply. Appellant-Respondent respectfully requests a ten (10) day extension, which (due to the 10 day extension falling on a weekend and the following Monday being Memorial Day) would place the new deadline at May 27, 2014. Absent unforeseen or exceptional circumstances, Counsel does not anticipate further extension of the deadline will be needed.

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:** 

Daryl G. Hawkins  
SC Bar No. 2844

1331 Elmwood Avenue, Suite 305  
Columbia, SC 29201-2150  
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*Attorneys for Appellant/Cross-Respondent*

May 13, 2014

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**PROOF OF SERVICE**

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I certify that I served Appellant-Respondent's Motion for Extension of Time to File Initial Brief and Related Designation of Matter to be Included on Appeal 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**

  
\_\_\_\_\_  
Sheri H. Neely, Legal Assistant

May 13, 2014

LAW OFFICE OF

**DARYL G. HAWKINS, LLC**

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May 13, 2014

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

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MAY 13 2014  
**SC Court of Appeals**

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:

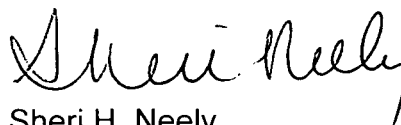
Enclosed for filing with your office are the original and seven (7) copies of:

1.	Appellant-Respondent's Return to Respondents/Appellants' Motion to Strike
2.	Appellant-Respondent's Motion for Extension of Time to File Initial Brief and Related Designation of Matter to be Included on Appeal

I would appreciate your returning a clocked copy of me via our courier. I have included \$25.00 to cover the cost of filing the Motion.

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

Sincerely,



Sheri H. Neely  
Legal Assistant to Daryl G. Hawkins

Enclosures

cc: John R. Ferguson, Esquire