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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Case Tracking No. 2013-^{SC}2319

APPEAL FROM LAURENS COUNTY
COURT OF COMMON PLEAS

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

RECEIVED

JUN 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-Respondent,

vs.

Martha Brown and Mary Moses Respondents-Appellants.

**MOTION FOR EXTENSION OF TIME TO
SERVE RECORD ON APPEAL
UPON RESPONDENTS-APPELLANTS**

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 serve the Record on Appeal (ROA) on the Parties.

Rule 210 (a), SCACR, provides that the Appellant must serve the Record on Appeal on each party who has served a brief within 30 days of the service of the last brief. The last brief, Initial Reply Brief of Appellant-Respondent, was

served and filed on May 27, 2014. Accordingly, the current deadline to serve the Record on Appeal is Thursday, June 26, 2014.

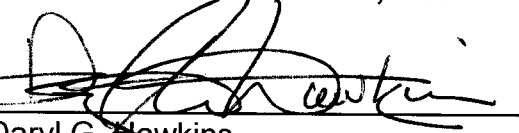
However, on June 2, 2014, Respondents-Appellants served and filed a Motion to Revise Designation of Matter on Appeal. Appellant-Respondent filed a Return to Motion to Revise Designation of Matter on Appeal on June 12, 2014. To avoid the deadline to serve the ROA prior to the Court ruling on the outstanding Motion, Appellant-Respondent requests a twenty (20) day extension from the Court's ruling, or such further time as the Court may designate, to serve the ROA. A twenty (20) day extension should allow sufficient time to finalize the ROA in compliance with any ruling of the Court on the outstanding Motion. This is the first request for an extension to serve the Record on Appeal.

Prior to filing, counsel for all parties consulted to resolve the issue and all consent to this request.

Appellant- 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: 
Daryl G. Hawkins
SC Bar # 2844

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

June 16, 2014

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 the Motion for Extension of Time to Serve Record on Appeal upon Respondents-Appellants via U.S. Mail upon:

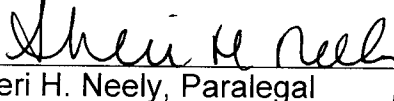
John R. Ferguson, Esquire
Cox Ferguson & Wham LLC
PO Box 286
Laurens, SC 29360-0286

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SC Court of Appeals

LAW OFFICE OF DARYL G. HAWKINS, LLC



Sheri H. Neely, Paralegal

June 17, 2014

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June 17, 2014

VIA HAND DELIVERY

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

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JUN 17 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

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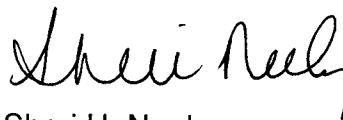
Dear Ms. Kitchings:

Enclosed for filing with your office are the original and seven (7) copies of Appellant-Respondent's Motion for Extension of Time to Serve Record on Appeal upon Respondents-Appellants.

I would appreciate your returning a clocked copy via our courier.

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

Sincerely,



Sheri H. Neely
Legal Assistant to Daryl G. Hawkins

Enclosures

cc: John R. Ferguson, Esquire