

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM LANCASTER COUNTY
William C. Tindal, Special Referee

NOV 13 2011
SC Court of Appeals

Ned Gregory, Jr.,-----Plaintiff/Respondent,
v.

Howell Jackson Gregory and
The Gregory Company, Inc.,-----Defendants/Appellants.

APPEAL FROM HORRY COUNTY
Cynthia Graham Howe, Master-in-Equity

Ned Gregory, Jr.,-----Plaintiff/Respondent,
v.

Howell Jackson Gregory-----Defendant/Appellant.

Consolidated Court of Appeals Case # 2013-002370

MOTION FOR EXTENSION TO FILE APPELLANT'S REPLY BRIEF

TO: THE HONORABLE CHIEF JUDGE AND ASSOCIATE JUDGES OF THE
COURT OF APPEALS OF SOUTH CAROLINA:

Appellants for the reasons stated below request that they be granted additional
time to file Appellants' Reply Brief as provided for under Appellate Rule 208 (a) (3)
in this consolidated appeal matter.

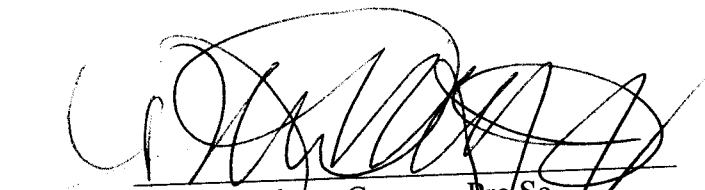
1. Historically the Court has previously extended the time to file for Respondent twice in Orders filed April 9, 2014 and April 29, 2014 which extended the time to file Respondent's Brief until May 2, 2014. Then after Appellants' timely motion of May 8, 2014 an extension was granted for Appellants' to file their initial reply brief by Friday, June 13, 2014 in an Order filed with the Court on June 9, 2014.
2. That the April 29, 2014 Order of the Court stated that no further extensions will be granted absent extraordinary circumstances and Appellant, Howell Jackson Gregory did suffer a heart attack while walking into the emergency room on the evening of Sunday, May 4, 2014 and was hospitalized until May 6, 2014 while being treated. That subsequently he was invited by his cardiologist to participate in the Cardiac Rehabilitation Clinic located in the Grand Strand Regional Medical Center for a period of eighteen (18) weeks and on Wednesday, June 11, 2014 he was evaluated and cleared for another six (6) weeks of additional assistance in rebuilding the heart through exercise and diet training under close nursing supervision which requires attendance every Monday, Wednesday and Friday mornings of each week.
3. Even though Appellant, Howell Jackson Gregory is recovering and twelve (12) more weeks are in the plan through the Cardiac Rehabilitation Clinic this takes time out of the work schedule to be able to devote to the preparation of the reply brief and the packaging of the briefs and record on appeal that follow.
4. Initially three to four months was requested to extend the time for the reply brief to be filed with the Court; however, the June 9, 2014 Order does not grant but a few days which is physically impossible at this time, therefore additional time is needed

under the current circumstances.

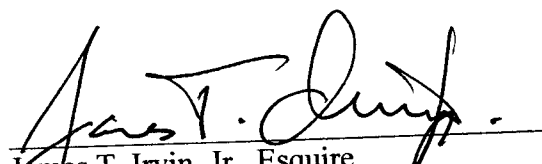
4. Now that a work schedule may be established to augment the cardiac rehab visits and the next six weeks satisfactory clearance has been granted by the attending nurse at the Cardiac Rehabilitation Clinic at the Grand Strand Regional Medical Center this allows a reasonable amount of time to devote to both projects without causing additional stress or strain of the person in the process.

5. Additional time is needed to complete the brief and during the next six (6) weeks efforts will be made to have the work completed and filed with the Court. Extension of time to Friday, July 25, 2014 is being requested to have the reply brief filed.

Respectfully submitted,



Howell Jackson Gregory, Pro Se
Appellant
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(843) 222-4800



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(843) 222-3228
Attorney for The Gregory Co., Inc.

Myrtle Beach, SC
June 12, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

William C. Tindal, Special Referee

Consolidated Court of Appeals Case No. 2013-002370

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JUN 11 2014

SC Court of Appeals

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JUN 18 2014

SC Court of Appeals

Ned Gregory, Jr.,Plaintiff/Respondent,

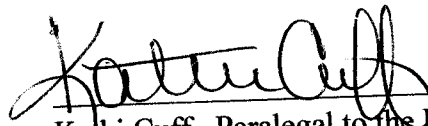
v.

Howell Jackson Gregory
and the Gregory Company,
Inc.,Defendants/Appellants.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Appellant's Reply Brief on Palmer Freeman by depositing a copy of it in the United States Mail, postage prepaid, on June 12, 2014, addressed to Palmer Freeman, P.O. Box 8024, Columbia, SC 29201, attorney for Respondent. The original and 6 copies are served by U.S. Mail to The Honorable Jenny Abbott Kitchings Clerk, SC Court of Appeals, at 1015 Sumter Street, Columbia, SC, 29201 on June 12, 2014.

June 12, 2014



Kathi Cuff, Paralegal to the Irvin Law Firm

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June 12, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
P. O. Box 11629
Columbia, SC 29211

RECEIVED
JUN 13 2014
SC Court of Appeals

RE: Consolidated Court of Appeals Case # 2013-002370

Appeal from Lancaster County – Case No. 2008-CP-29-1084
Appeal from Horry County – Case No. 2002-CP-26-1706

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S REPLY BRIEF

Dear Ms. Kitchings:

Enclosed herewith please find Appellant's motion as described consisting of an original and six copies along with the Twenty Five (\$25.00) Dollar motion fee.

A copy is also being forwarded to Palmer Freeman, Esquire at his P. O. Box 8024, Columbia, SC 29202.

With kind regards, I am,

Yours truly,


James T. Irvin, Jr.

JTI:kc
Enclosures as stated

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APR 11 2016

SC Court of Appeals

Irvin Law Firm, LLC
Post Office Box 2677
Myrtle Beach, SC 29578

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
P. O. Box 11629
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