

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

CARMEN T. MULLEN, JUDGE

Case Number 12-CP-27-0760
Court of Appeals Case No. 2014-000823

RECEIVED

JUL 28 2014

SC Court of Appeals

ROBERT C. SCHIVERA, Executor of the
Estate of Fred J. Hughes.....Respondent.


v.

C. Russell Keep, III, Esquire, and Rhonda Mitchell,
Jasper County Tax Collector, of which C. Russell Keep, III,
Esquire, is the.....Appellant.

**RESPONDENT'S
MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF**

The Respondent hereby moves for an extension of time to file
its Initial Brief. This motion is based upon the attached
Affidavit of R. Thayer Rivers, Jr.

Law Office of R. Thayer Rivers, Jr.



R. THAYER RIVERS, JR.
Post Office Box 668
Ridgeland, South Carolina 29936
(843) 726-8136

Attorney for the Plaintiff

Ridgeland, South Carolina,

July 23, 2014.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

CARMEN T. MULLEN, JUDGE

Case Number 12-CP-27-0760
Court of Appeals Case No. 2014-000825

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JUL 28 2014

SC Court of Appeals

ROBERT C. SCHIVERA, Executor of the
Estate of Fred J. Hughes.....Respondent.

v.

C. Russell Keep, III, Esquire, and Rhonda Mitchell,
Jasper County Tax Collector, of which C. Russell Keep, III,
Esquire, is the.....Appellant.

AFFIDAVIT OF R. THAYER RIVERS, JR.

PERSONALLY APPEARED before me, R. Thayer Rivers, Jr., who,
upon being duly sworn, states as follows:

1. That I am the attorney for the Respondent in the above-captioned matter.
2. That our Initial Brief is due on or about July 25, 2014.
3. That I have had several hearings, depositions and mediations in that past month, as well as my paralegal being out on vacation.
4. That due to the foregoing, the Respondent hereby requests that they be given an additional 30 days from the original due date (August 25, 2014) to file its Initial Brief.

R. Thayer Rivers, Jr.
R. Thayer Rivers, Jr.

SUBSCRIBED AND SWORN TO before me

this 23 day of July, 2014.

Kathleen Gordon (L.S.)
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 10-13-11

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SC Court of Appeals

Case Number 12-CP-27-0760
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ROBERT C. SCHIVERA, Executor of the
Estate of Fred J. Hughes.....Respondent.

v.

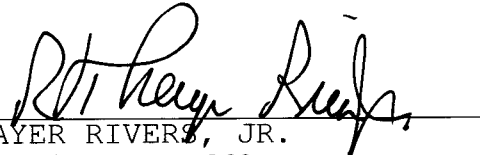
C. Russell Keep, III, Esquire, and Rhonda Mitchell,
Jasper County Tax Collector, of which C. Russell Keep, III,
Esquire, is the.....Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant with a copy of the Respondent's Motion for Additional Time to File Initial Brief, by depositing a copy of same in the United States Mail, postage prepaid, on July 23, 2014, addressed to its attorney of record, C. Russell Keep, III, Esquire, Post Office Box 5877, Hilton Head Island, SC 29938.

July 23, 2014.

Law Office of R. Thayer Rivers, Jr.



R. THAYER RIVERS, JR.
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Attorney for the Appellant

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R. THAYER RIVERS, JR.
ALSO ADMITTED IN GEORGIA

TELEPHONE
(843) 726-8136
TELECOPIER
(843) 726-4401

July 23, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

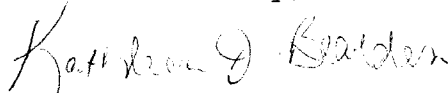
RE: ROBERT C. SHIVERA v. C. RUSSELL KEEP, III
APPELLATE CASE NUMBER: 2014-000823

Dear Ms. Kitchings:

Enclosed herewith please find the original and seven (7) copies of the Respondent's Motion for Additional Time to File Initial Brief in the above-referenced matter, together with our check in the amount of \$25.00 for the filing fee. Please file the original and return a clocked-in copy to me in the envelope provided.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

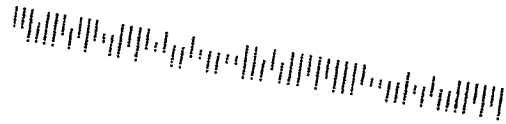
:kjb
Enclosures

cc: C. Russell Keep, III, Esquire

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SC Court of Appeals



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