

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

Case No. 2012-CP-26-03804

RECEIVED

NOV 06 2014

Court of Appeals

174078

Mark Kelley, ..... Respondent,

v.

David Wren and Sun Publishing Co., Inc., d/b/a *The Sun News*, ..... Appellants.

**MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER TO BE  
INCLUDED IN RECORD ON APPEAL**


The **Initial Brief of Respondent** and **Designation of Matter to be Included in Record on Appeal** is due on November 14, 2014. My wife was admitted to the hospital on October 31, 2014, with chest pains and is still a patient. I have two cases scheduled for trial in November and need to prepare for them. Because of the above, I do not have available time to devote to the preparation of the Initial Brief of Respondent and Designation of Matter.

I have spoken with Jay Bender, Attorney for Appellants, and discussed the extension of time and he advises he will consent to an additional 30-day extension and, if necessary, will contact

the Court of Appeals to confirm that fact.

The attorney for the Respondent hereby requests this Court grant an additional 30-day extension of time in which to file the **Initial Brief of Respondent and Designation Of Matter To Be Included In Record on Appeal.**

STEVENS LAW FIRM, P.C.

By: A handwritten signature in black ink, appearing to read 'James P. Stevens, Jr.', written over a horizontal line.

JAMES P. STEVENS, JR.

Post Office Drawer 127

Loris, S. C. 29569-0127

843.756.7652; 843.756.3785--Fax

Attorney for Respondent

November 4, 2014.

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

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Case No. 2012-CP-26-03804

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Mark Kelley, ..... Respondent,

v.

David Wren and Sun Publishing Co., Inc., d/b/a *The Sun News*, ..... Appellants.

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**PROOF OF SERVICE**

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I certify that I have served the **Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter To Be Included in Record on Appeal** by depositing a copy of it in the United States Mail, postage prepaid, on November 4, 2014, addressed to the attorney of record for the Appellant:

Mr. Jay Bender  
Baker Ravenel Bender  
Post Office Box 8057  
Columbia, South Carolina 29202

STEVENS LAW FIRM, P.C.

By: 

JAMES P. STEVENS, JR.

Post Office Drawer 127

Loris, S. C. 29569-0127

843.756.7652

Attorney for Respondent

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November 4, 2014

**SC Court of Appeals**

# STEVENS LAW FIRM, P.C.

JAMES P. STEVENS, JR.\*  
NATALIE S. STEVENS-GRAZIANI

\*Certified Civil Mediator

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E-Mail: natalie@stevens-law-firm.com

November 4, 2014

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

Re: *Mark S. Kelley v. David Wren and Sun Publishing Company, Inc., d/b/a The Sun News*  
Civil Action No. 2012-CP-26-03804 - Appellate Case No. 2014-001249


Dear Ms. Kitchins:

Enclosed for filing is the following:

1. Original and six copies of a **Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter to Be Included in Record on Appeal.**
2. **Proof of Service** of the Motion on the Appellate.
3. A filing fee of \$25.

Please acknowledge receipt of this Motion by returning a copy of this letter to me in the enclosed envelope.

Sincerely,

  
James P. Stevens, Jr.

JPSjr/pk

enclosures

cc: Mr. Jay Bender

**RECEIVED**  
NOV 06 2014  
**SC Court of Appeals**