

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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DEC 12 2014

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

Doyet A. Early, III, Circuit Court Judge

74458

Case No. 2010-CP-02-03055

Melissa J. Lackey-Oremus
and James T. Oremus,

Appellants,

v.

4 K&D Corporation, d/b/a Grand
Estates Auction Company, Stacy
Kirk and Valaria Devine

Respondents.

**APPELLANTS' MOTION TO EXTEND
TIME TO FILE
INITIAL REPLY BRIEF**

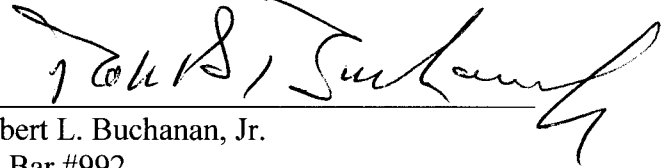
Please take notice that the Appellants hereby request an extension of time to file their Initial Reply Brief, which would be due December 15, 2014 under the Appellate Court Rules, until January 14, 2015.

The reason for this specific request is that, in addition to usual year-end time pressures associated with the busy litigation practices of Mr. Buchanan and Mr. Braithwaite and the holidays, Mr. Braithwaite's youngest son, a senior at the Citadel, was involved in a horrific motor vehicle accident in Aiken, SC on November 25, 2014, and was discharged from an Augusta, Ga. hospital on December 6, 2014, after undergoing three major surgeries. Mr.

Braithwaite's son is immobile and requires around the clock care at home. Mr. Braithwaite just returned to the office this morning on a very limited and part-time basis.

Counsel for Respondents have graciously agreed to the specific request for an extension, which would make the Initial Reply Brief due January 14, 2015.

Respectfully submitted,



Robert L. Buchanan, Jr.
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Robin A. Braithwaite
SC Bar #852
Braithwaite Law Firm
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Attorneys for Appellants

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SC Court of Appeals

Case No. 2010-CP-02-03055
Appellate Case No. 2014-001579

Melissa J. Lackey-Oremus and James T. Oremus Appellants

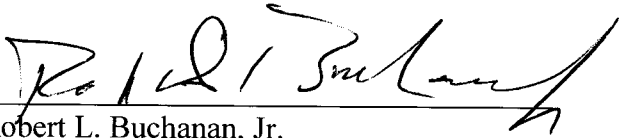
v.

4 K&D Corporation, d/b/a Grand Estates Auction Company,
Stacy Kirk and Valaria Devine Respondents.

PROOF OF SERVICE

I certify that I have served a copy of Appellants' Motion to Extend Time to File Initial Reply Brief on 4 K&D Corporation, d/b/a Grand Estates Auction Company, Stacy Kirk and Valaria Devine by depositing a copy of it in the United States Mail, postage prepaid, on December 10, 2014, addressed to its/their attorney of record, Alice F. Paylor, Rosen Rosen & Hagood, LLC, Post Office Box 893, Charleston, South Carolina 29402

December 10, 2014



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Robert L. Buchanan, Jr.

December 10, 2014

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SC Court of Appeals

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

Re: Melissa J. Lackey-Oremus and James T. Oremus, Appellants
v. 4 K&D Corporation, d/b/a Grand Estates Auction Company
Stacy Kirk and Valaria Devine, Respondents
Case No. 2010-CP-02-03055
Appellate Case No. 2014-001579


Dear Madame Clerk:

Enclosed herewith for filing please find the original and six copies of the Appellants' Motion to Extend Time to File Initial Reply Brief, together with Proof of Service in the above case and Buchanan Law Office, P. A. Trust Account Check #2252 payable to SC Court of Appeals in the amount of \$25.00. Please return a "filed" copy for our records in the enclosed, stamped envelope.

By copy of this letter, we are serving a copy of the Appellants' Motion to Extend Time to File Initial Reply Brief, together with Proof of Service on Alice F. Paylor, counsel for the Respondents.

With best regards, I

Yours very truly,

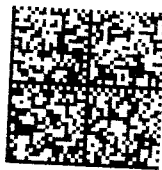

Robert L. Buchanan, Jr.

ph

CC: Alice F. Paylor, Esquire w/encls.



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SC Court of Appeals

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