

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson  
Circuit Court Judge

---

Case No.: 2012-CP-10-8372  
Appellate Case No. 2014-002450

---

74386  
**RECEIVED**  
DEC 10 2014  
**SC Court of Appeals**

Hattie Mae Greene ..... Appellant

v.

Cindy M. Floyd ..... Respondent

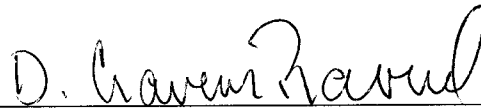
---

**MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF, DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AND PROOF OF SERVICE THEREOF, AND TO HOLD FILING DEADLINES IN ABEYANCE UNTIL THE COURT ISSUES AN ORDER DECIDING THE MOTION OF THE MERITS**

---

Appellant Hattie Mae Greene hereby moves for an extension of time for filing its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof, on the Respondent in the above-referenced case. Respondent's Order Granting Defendant's Motion for Summary Judgment was served by mail on Appellant's counsel on October 24, 2014 and Appellant received Respondent's Order Granting Motion for Summary Judgment on October 29, 2014. Appellant filed its Notice of Appeal on November 12, 2014. Due to the issues raised in the Respondent's order which necessitate a response from Appellant and time limitations, counsel for Appellant respectfully requests additional time to complete the service and filing of its Initial Brief, Designation of Matter to be Included in the Record on

Appeal, and Proof of Service. Counsel for Appellant requests a thirty (30) day extension of time such that the service and filing of its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof would be due on Monday, January 12, 2015. While this motion is pending, Appellant requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Appellant's counsel has conferred with counsel for Respondent, who has consented to the extension of time requested herein.



---

D. Cravens Ravenel SC Bar No.: 4642  
Baker, Ravenel & Bender, L.L.P.  
3710 Landmark Drive, Suite 400  
Post Office Box 8057  
Columbia, South Carolina 29202  
Phone: (803) 799-9091; Fax: (803) 779-3423  
[cravenel@brblegal.com](mailto:cravenel@brblegal.com); Our File: 10743  
*Attorneys for Appellant*

December 5, 2014  
Columbia, South Carolina

Other Counsel of Record:

M. Dawes Cooke, Jr., Esquire  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, South Carolina 29401-0197  
Phone: (843) 577-7700; Fax: (843) 577-7708  
[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)  
*Attorney for Respondent*

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson  
Circuit Court Judge

---

**RECEIVED**  
DEC 05 2014  
**SC Court of Appeals**

---

Case No.: 2012-CP-10-8372  
Appellate Case No. 2014-002450

---

Hattie Mae Greene ..... Appellant

v.

Cindy M. Floyd ..... Respondent

---

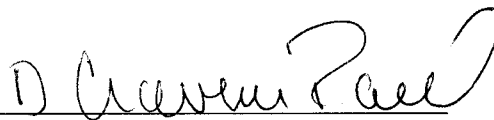
**PROOF OF SERVICE**

---

I, D. Cravens Ravenel, attorney for the Appellant, do hereby certify that I have served on this 5<sup>th</sup> day of December 2014, a copy of the Motion for Extension to File and Serve Initial Brief, Designation of Matter to be included in the Record on Appeal, and Proof of Service Thereof, and to Hold Filing Deadlines in Abeyance Until the Court Issues an order Deciding the Motion of the Merits upon counsel for Respondent by delivering via U.S. Mail, first class postage pre-paid, to said counsel at the following address:

M. Dawes Cooke, Jr., Esquire  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, South Carolina 29401-0197

*(Signature on following page)*



D. Craven Ravenel SC Bar No.: 4642  
Baker, Ravenel & Bender, L.L.P.  
3710 Landmark Drive, Suite 400  
Post Office Box 8057  
Columbia, South Carolina 29202  
Phone: (803) 799-9091; Fax: (803) 779-3423  
[cravenel@brblegal.com](mailto:cravenel@brblegal.com); Our File: 10743  
*Attorneys for Appellant*

December 5, 2014  
Columbia, South Carolina



## BAKER RAVENEL BENDER

ATTORNEYS AT LAW

D. Cravens Ravenel  
[cravenel@brblegal.com](mailto:cravenel@brblegal.com)  
(803) 343-3861 – direct dial

December 5, 2014

**Hand Delivery**

The Honorable Tanya A. Gee  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Hattie Mae Greene v. Cindy M. Floyd  
Case No.: 2012-CP-10-8372  
Appellate Case No. 2014-002450  
Our File No.: 10743.1

**RECEIVED**

DEC 05 2014

**SC Court of Appeals**

Dear Ms. Gee:

Enclosed for filing in the above-referenced matter is an original and seven (7) copies of a Motion for Extension to File and Serve Initial Brief, Designation of Matter to be included in the Record on Appeal, and Proof of Service Thereof, and to Hold Filing Deadlines in Abeyance Until the Court Issues an order Deciding the Motion of the Merits. Please return a clocked copy to me via courier delivering same. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee.

By copy hereof, I am serving the same upon counsel for Appellant, who has graciously consented to the extension requested.

Sincerely,

D. Cravens Ravenel

DCR:sr

Enclosure

Other Counsel of Record  
M. Dawes Cook, Jr., Esquire  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, South Carolina 29401-0197  
(803) 577-7700