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December 18, 2014

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

RECEIVED
DEC 22 2014
SC Court of Appeals

RE: RE: Rene' McMasters, now known as Rene McMasters Ronaghan.v. H. Wayne
Charpia,et.al

Our file: 09-084/Appeal

Appeal No.: 2013-002311

Dear Madam Clerk:

Enclosed is the original and seven (7) copies of the Respondent's Motion to Require the Appellant to Serve the Record on Appeal and For an Order Granting The Respondent an Extension of Time to File her Final Brief , my Affidavit, my firm check payable to the Clerk's office in the amount of \$25.00 and my Proof of Service. I would appreciate you returning one (1) filed copy of each document to me in the self-addressed stamped envelope provided.

With kindest regards, I am

Very truly yours,



Frank M. Cisa

FMC/alp

cc: H. Wayne Charpia (w/enc.)
Jody E. Charpia (w/enc.)

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

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DEC 22 2014

APPELLATE CASE NUMBER 2013-002311

SC Court of Appeals

Rene McMasters now known as Rene McMasters Ronaghan.....Respondent

vs.

H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia.....Appellants

MOTION TO REQUIRE THE APPELLANTS TO SERVE THE RECORD ON APPEAL AND
FOR AN ORDER GRANTING THE RESPONDENT AN EXTENSION OF TIME TO FILE
HER FINAL BRIEF

Respondent, Rene McMasters Ronaghan, hereby moves before the Court for an Order requiring the Appellant to serve the Respondent's counsel with a copy of the Record on Appeal and further that this Court allow the Respondent twenty (20) days after service of the Record on Appeal to serve a copy of her Final Brief and to file the Final Brief with the Clerk of the Appellant Court.

The grounds for this motion are that the Appellants have failed to serve the Record on Appeal to Respondent's counsel as required by Rule 210, SCACR and as a result the Respondent is unable to file and serve her Final Brief.

Pursuant to Rule 211, SCACR, the Respondent is allowed twenty (20) days after service of the Record on Appeal to serve a copy of her Final Brief and to file her Final Brief with the Clerk of the Appellant Court.

This motion supported by the Affidavit of Counsel which is attached hereto.

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OFFICE OF THE
DIRECTOR

CISA & DODDS, LLP



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Attorneys for the Respondent,
Renee McMasters Ronaghan

This 10th day of December, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

RECEIVED
DEC 22 2014
SC Court of Appeals

APPELLATE CASE NUMBER 2013-002311

Rene McMasters now known as Rene McMasters Ronaghan.....Respondent

vs.

H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia.....Appellants

AFFIDAVIT OF FRANK M. CISA

PERSONALLY, appeared before, Frank M. Cisa, who being duly sworn, deposes and says as follows:

1. That he is the attorney for the Respondent relative to the above appeal.
2. That he served the Respondent's Initial Brief and Designation of Matter to Be Included In the Record on Appeal on the Appellants on August 8, 2014, as shown by the Proof of Service filed with the Clerk of the South Carolina Court of Appeals.
3. That Respondent's attorney has not received a copy of the Record on Appeal from the Appellants and is therefore unable to serve and file Respondent's Final Brief.

FURTHER THE DEPONENT SAYETH NOT!

OFFICE OF THE ATTORNEY GENERAL

STATE OF TEXAS

DAVID L. GREGG

JMC

Frank M. Cisa
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464
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E-mail: frank@cisadodds.com

Attorneys for the Respondent,
Renee McMasters Ronaghan

SWORN to before me this 18th
day of December, 2014

Ashley Pudee
Notary Public for South Carolina

My Commission Expires: 11/7/2015

This 18th day of December, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Case No.: 2009-CP-18-2200
EDGAR W. DICKSON

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DEC 22 2014

SC Court of Appeals

Rene McMasters now known as Rene McMasters Ronaghan.....Respondent

vs.

H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia.....Appellants

PROOF OF SERVICE

I certify that I have served a copy of the Respondent's Motion to Require the Appellant to Serve the Record on Appeal and For an Order Granting The Respondent an Extension of Time to File her Final Brief and Affidavit of Frank M. Cisa, by United States Mail, postage prepaid, on December 18, 2014, addressed to the Appellants, H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia at 1450 Jahnz Avenue, Summerville, SC 29485



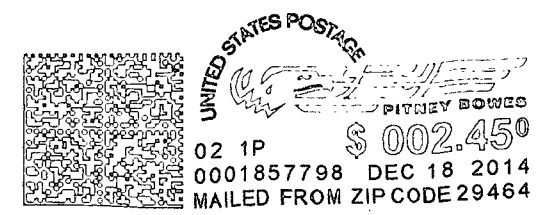
Frank M. Cisa
Cisa & Dodds, LLP
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464
(843) 881-6530
Attorney for the Respondent

December 18th, 2014

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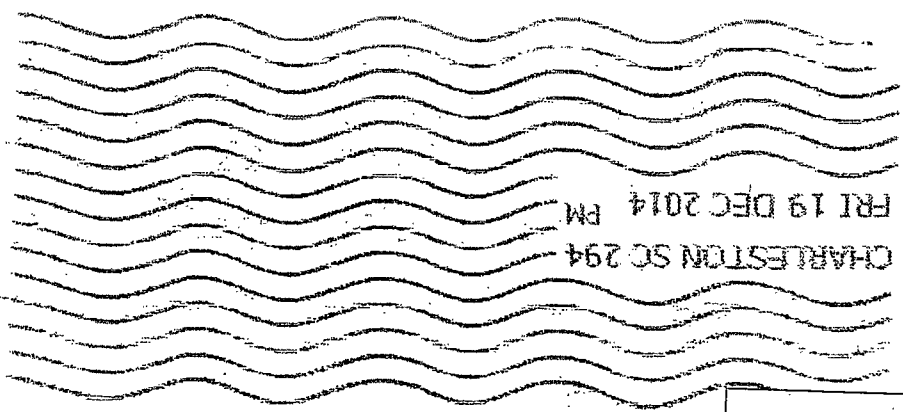
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