

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2008-CP-22-00466
Appellate Case No. 2010-168831

Hazel Jeisel Rivera,..... Respondent,

v.

RECEIVED

JAN 08 2015

S.C. SUPREME COURT

Warren Jared Newton, Newton's Farm, J&J
Logging, Inc. and Edgar Rivera Petitioners.

NOTICE OF MOTION AND
MOTION FOR EXTENSION
TO FILE REPLY BRIEF

Petitioner Edgar Rivera hereby moves for an extension of time to file the above-referenced document under Rule 242(i), SCACR. The grounds for this motion are that the undersigned did not actually receive the Brief of the Respondent until December 19, 2014. The undersigned would request an additional ten (10) days to file the necessary documents under Rule 242(i), SCACR. All other counsel of record have indicated their consent to this motion; (attached as Exhibit A).

(SIGNATURE PAGE TO FOLLOW)

January 5, 2015



Brandon A. Smith
KING, LOVE & SMITH, LLC
Post Office Box 1810
Greenwood, SC 29648
(864) 538-4076
(864) 538-4021 (f)
ATTORNEY FOR PETITIONER EDGAR RIVERA

Erin Brown

From: Sid Connor <sconnor@classactlaw.net>
Sent: Tuesday, December 23, 2014 1:44 PM
To: Erin Brown; hudsonlaw@sc.rr.com
Cc: Brandon Smith
Subject: RE: Rivera v. Rivera - request for extension

Yes.

From: Erin Brown [mailto:ebrown@klslawfirm.com]
Sent: Tuesday, December 23, 2014 11:40 AM
To: Sid Connor; hudsonlaw@sc.rr.com
Cc: Brandon Smith
Subject: Rivera v. Rivera -- request for extension

Sid and Dwight,

Brandon did not receive the Respondent's brief until Friday, December 19th. Would you agree to an extension for Brandon to file any reply brief, if necessary, to December 31, 2014? Should you have any questions or concerns, please let us know.

Thank you,

Erin L. Brown
Litigation Paralegal
King, Love & Smith, LLC
214 Waller Avenue, Suite 100
Greenwood, SC 29649
(864) 538-4076 – Direct
(864) 538-4021 – Fax

CONFIDENTIALITY NOTE: THIS E MAIL HAS BEEN SENT FROM A LAW FIRM. IT MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION AND IS INTENDED SOLELY FOR THE USE OF PERSON OR PERSONS NAMED ABOVE. IF YOU ARE NOT AN INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION OR DUPLICATION OF THIS E MAIL IS PROHIBITED AND THAT THERE SHALL BE NO WAIVER OF ANY PRIVILEGE OR CONFIDENCE BY YOUR RECEIPT OF THIS TRANSMISSION. IF YOU HAVE RECEIVED THIS EMAIL IN ERROR, PLEASE NOTIFY US IMMEDIATELY AT (843)238-5648.

Exhibit A

Erin Brown

From: Mary Anne Graham <mgraham12@sc.rr.com>
Sent: Tuesday, December 23, 2014 11:42 AM
To: Erin Brown; 'Sid Connor'; hudsonlaw@sc.rr.com
Cc: Brandon Smith
Subject: RE: Rivera v. Rivera - Email reply of Hudson consenting to extension

Erin:

We have no objection to Brandon's request and you can certainly advise the Court that we consent to the same –

J. Dwight Hudson, Esq.

By: Mary Anne Graham, Esq.

Hudson Law Offices

1203 48th Ave. N., Ste 111

Myrtle Beach, SC 29577

T: 843.692.9889

F: 843.692.9190

E: mgraham@hudsonlawoffice.com

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Cc: Brandon Smith
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**THE STATE OF SOUTH CAROLINA
In The Supreme Court**

**APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas**

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**Case No. 2008-CP-22-00466
Appellate Case No. 2010-168831**

Hazel Jeisel Rivera,..... Respondent,

v.

**Warren Jared Newton, Newton's Farm, J&J
Logging, Inc. and Edgar Rivera Petitioners.**

**CERTIFICATE OF SERVICE
FOR PETITIONER EDGAR RIVERA
FOR NOTICE OF MOTION AND
MOTION TO FILE REPLY BRIEF**

This is to certify that I have deposited in the U.S. Postal Service one copy of the Notice of Motion and Motion for Extension to File Reply Brief to the following counsel of record with proper postage affixed thereto and mailed to the addresses as follows:

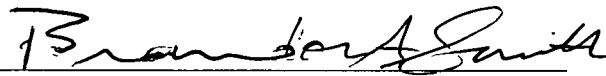
J. Dwight Hudson, Esquire
Hudson Law Offices
1203 48th Avenue North
Suite 111
Myrtle Beach, SC 29577

L. Sidney Connor, IV
Kelaheer, Connell & Connor, P.C.
Post Office Drawer 14547
Surfside Beach, SC 29587

this 5th day of January, 2015.

I have also submitted a copy of this Notice of Motion and Motion for Extension to File Reply Brief and to the Supreme Court at its mailing address

The Honorable Daniel E. Shearouse, Clerk
Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211



Brandon A. Smith
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KING, LOVE & SMITH, LLC
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ATTORNEY FOR PETITIONER EDGAR RIVERA

**KING
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SMITH, LLC**
ATTORNEYS AT LAW

135 South Dargan Street, Suite 201, Florence, SC 29506
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Fax 843-407-5782

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Fax 864-538-4021

www.klslawfirm.com

Reply to: Greenwood Office

Robert T. King †*
Edward A. Love **
Brandon A. Smith †
Charles J. Hupfer, Jr.
Ashley B. Nance

† CERTIFIED MEDIATOR
* ALSO ADMITTED IN NC
** ALSO ADMITTED IN GA

January 5, 2015

The Honorable Daniel E. Shearouse, Clerk
Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

Re: *Hazel Jeisel Rivera v. Warren Jared Newton, Newton's Farm, J & J Logging, Inc. and Edgar Rivera*
Case No.: 2008-CP-22-00466
Appellate Case No.: 2010-168831
Our File No.: 4615.00555

Dear Mr. Shearouse:

Please find enclosed the Petitioner Edgar Rivera's Notice of Motion and Motion for Extension to File Reply Brief along with the Proof of Service in regards the above-referenced matter. Please file the original in your office and return the clocked copy to us in the enclosed envelope. We have also enclosed our firm's check in the amount of \$25 which represents the filing fee.

By copy of this letter to all counsel of record, we are herewith serving them with Petitioner Rivera's Notice of Motion and Motion for Extension to File Reply Brief.

Sincerely,

KING, LOVE & SMITH, LLC

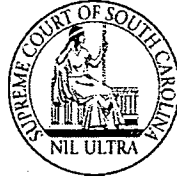


Brandon A. Smith

BAS/eb
Enclosures

cc: L. Sidney Connor, IV, Esquire
J. Dwight Hudson, Esquire

RECEIVED
JAN 08 2015
S.C. SUPREME COURT



The Supreme Court of South Carolina

King Love & Smith

01/08/2015

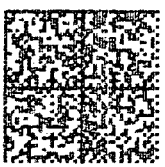
RECEIPT #74712

Case No: 2013-000674
Case Short Title: Hazel Rivera v. Warren Newton
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 154
Check/Money Order Date: 01/05/2015
Comments:

**KING
LOVE &
SMITH, LLC**
ATTORNEYS AT LAW

King, Love & Smith, LLC
PO Box 1810
Greenwood, SC 29648

The Honorable Daniel E. Shearouse, Clerk
Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211



UNITED STATES
FITNEY BOWES
\$000.00⁰⁰
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