

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JAN 14 2015

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

SC Court of Appeals

Robert W. Davis, Special Referee

74769

Appellate Case No. 2014-002287

Founders Federal Credit Union, Respondent,

v.

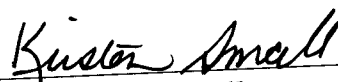
Kay S. Cassells Hoag, Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Respondent Founders Federal Credit Union moves for a 7-day extension in which to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This motion is made on the grounds that, due to the undersigned counsel's trial schedule and work load, additional time is needed to prepare and file the Initial Brief and Designation of Matter. This is Respondent's second request for an extension, and it not intended for purposes of delay.

Rather, the request for extension is necessitated by the deadline for a significant federal court filing, responsibility for which has fallen onto undersigned counsel due to other attorneys' court schedules.

By the undersigned's calculations the extension, if granted, would extend the deadline for filing the Initial Brief and Designation of Matter to Friday, January 16, 2015.



Kirsten E. Small
Suzanne Taylor Graham Grigg
Nexsen Pruet, LLC
55 East Camperdown Way (29601)
Post Office Drawer 10648
Greenville, SC 29603-0648
PHONE: 864.370.2211
FACSIMILE: 864.282.1177
KSmall@nexsenpruet.com

Attorneys for Respondent
Founders Federal Credit Union

January 9, 2015
Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

Robert W. Davis, Special Referee

Appellate Case No. 2014-002287

Founders Federal Credit Union, Respondent,


v.

Kay S. Cassells Hoag, Appellant.

PROOF OF SERVICE

I certify that this 9th day of January, 2015, I have served the foregoing Respondent's Motion for Extension of Time To File Initial Brief and Designation of Matter via U.S. Mail, first class postage prepaid, on the following counsel:

J. Edwin McDonnell, Esq.
South Carolina Legal Services
148 E. Main Street
Spartanburg, SC 29306


Kirsten E. Small

December 9, 2014

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

Re: Founders Federal Credit Union v. Kay S. Cassells Hoag
Appellate Case No. 2014-002287

Dear Ms. Kitchings:

Please find enclosed herewith the original and eight copies of Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter and Proof of Service for same, and a check in the amount of \$25.00 for the filing fee. Please file the original and six copies and return two clocked copies to me in the enclosed self-addressed, postage-paid envelope. By copy of this letter, I am providing J. Edwin McDonnell with a copy of the Motion and Proof of Service.

Thank you for your cooperation in this regard, and if you have any questions, please do not hesitate to contact me.

Very truly yours,



Kirsten E. Small

KES/dkr

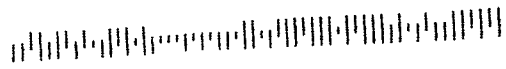
Enclosures

cc: J. Edwin McDonnell, Esq.

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St. John's Episcopal Church

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Greenville SC 29603-0648

The Honorable Jenny Abbott Kitchings
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The South Carolina Court of Appeals
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Columbia, SC 29211