

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

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SC Court of Appeals

75004

Hattie Mae Greene Appellant,

v.

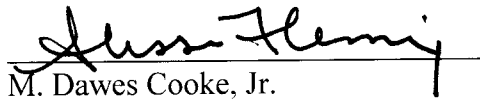
Cindy M. Floyd Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
RESPONDENT'S INITIAL REPLY 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 ON THE MERITS**

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Respondent Cindy M. Floyd hereby moves for an extension of time for filing her Initial Reply Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof, on the Appellant in the above-referenced matter. Appellant's Initial Brief was served by mail on Respondent's counsel on January 12, 2015. Due to time limitations, counsel for Respondent respectfully requests a thirty (30) day extension of time such that service would be due March 13, 2015. While this Motion is pending, Respondent requests that all filing deadlines be

held in abeyance until the Court issues an order deciding this Motion on the merits. Respondent's counsel has conferred with counsel for Appellant, who has consent to the extension of time requested herein.

February 5, 2015



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Charleston, SC 29402
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Attorneys for Appellant

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Hattie Mae Greene Appellant,

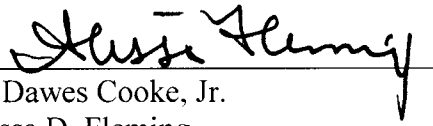
v.

Cindy M. Floyd Respondent.

PROOF OF SERVICE

I, Alissa D. Fleming, attorney for the Respondent, do hereby certify that I have served on this 5th day of February, 2015, a copy of the Motion for Extension of Time to File and Serve Initial Reply Brief of Respondent, 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 on the Merits upon counsel for Appellant by delivering via U.S. Mail, first class postage pre-pad, to said counsel at the following address:

D. Cravens Ravenel, Esquire
Baker, Ravenel & Bender, LLP
Post Office Box 8057
Columbia, SC 29202



M. Dawes Cooke, Jr.
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February 5, 2015
Charleston, South Carolina



Alissa D. Fleming, Esquire
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February 5, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
John C. Calhoun Building
1015 Sumter Street
Columbia, SC 29201

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RE: Hattie Mae Greene vs. Cindy M. Floyd
Appellate Case No.: 2014-002450

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of a Motion for Extension to File and Serve Respondent's Initial Reply 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 on the Merits. Also enclosed is our firm's check in the amount of Twenty-Five (\$25.00) Dollars for the filing fee. Please return a clocked copy to us in the enclosed self-addressed, stamped envelope provided for your convenience.

Sincerely,

M. Dawes Cooke, Jr.
Jeffrey M. Bogdan
Alissa D. Fleming

MDCjr/ADF/jgc
Enclosures (as stated)

cc: VIA E-MAIL AND U.S. MAIL
D. Cravens Ravenel, Esquire

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B.C. Killough*
Randell C. Stoney, Jr.
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David S. Cox

William C. Helms, III
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**BARNWELL
WHALEY** | **75** YEARS ■
PATTERSON & HELMS LLC

P.O. Drawer H, Charleston, SC 29402-0197

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SC Court of Appeals

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Clerk, South Carolina Court of Appeals
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Columbia, SC 29201

