

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
In the Court of Common Court

The Honorable J. Derham Cole, Circuit Court Judge

Case No. 2014-CP-42-1081

Lenora Whitfield Tucci,

Appellant,

v.

April Tucci and Robert D.
Ganyard, Personal
Representatives of the Estate
of Francis Paul Tucci, Jr.

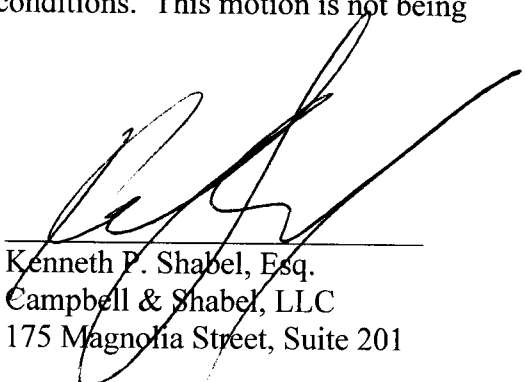
Respondents.

MOTION TO EXTEND TIME TO FILE
APPELLANT'S INITIAL BRIEF

Appellant moves this Court to extend the deadline to file the Appellant's Initial Brief to April 8, 2015. The current deadline is March 11, 2015.

I hereby certify that this extension is necessary due to exceptional circumstances. In the past thirty days, the undersigned attorney has had a very heavy hearing and mediation schedule. There have also been multiple days when the office was closed due to winter weather conditions. This motion is not being made to cause unnecessary delay.

March 10, 2015



Kenneth P. Shabel, Esq.
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175 Magnolia Street, Suite 201

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ATTORNEYS AT LAW

OF COUNSEL:
Sean Giovannetti

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March 10, 2015

VIA FACSIMILE AND REGULAR MAIL

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211,
Fax: 803-734-1839

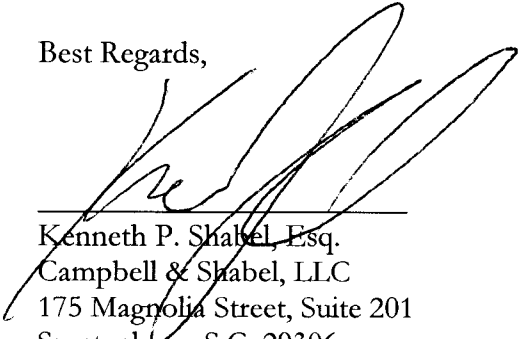
RE: Lenora Whitfield Tucci v. April Tucci and Robert D. Ganyard, Personal
Representatives of the Estate of Francis Paul Tucci
Appellate Case Number 2014-002726

Dear Ms. Kitchings:

Please find enclosed an original and six copies of Appellant's Motion to Extend Deadline for Initial Brief in the above-referenced case. The required filing fee is also enclosed.

Do not hesitate to contact me if you need additional documentation.

Best Regards,



Kenneth P. Shabel, Esq.
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Attorney for Appellant

\Enclosures

cc: James W. Shaw, Esq.

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