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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2014-002020

Circuit Case No. 2011-CP-10-7819

BETTY FISHERAppellant

v.

BESSIE HUCKABEE.....Respondent

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD**

JOHN HUGHES COOPER, ESQUIRE
1476 Ben Sawyer Blvd., Suite 7
Mt. Pleasant, SC 29464
843-883-9099; fax 843-883-9335
shiplaw@jhcooper.com
(Attorney for Appellant)

COMES NOW Betty Fisher, Appellant in the above appeal, and, pursuant to Rule 263(b),
SCACR, moves for a 30 day extension of time to file her Initial Brief of Appellant and
Designation of Matters to be Included in the Record.

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SC Court of Appeals

By Order entered January 6, 2015 the time for filing Appellant's initial brief and designation of matter was extended until February 6, 2015. On January 27, 2015 Appellant moved to consolidate the appellate record in this and in two related appeals, to allow filing of a reduced number of copies of the record, and to allow 30 days to file briefs and designations after a ruling on said motion.

On March 9, 2015 counsel for Appellant was informed that the Court had granted the motion to consolidate the appellate record, and to allow filing of a reduced number of copies of the record. Counsel for Appellant was informed that the Court did not grant or deny the request for 30 days to file briefs and designations. This is Appellant's second extension request, and an extension is needed due to simple fact that until the Court's ruling upon the motion to consolidate, Appellant could not know whether to file separate designations of matter for each of the three related appeals or whether to file a consolidated designation of matter. Due to the work schedules of counsel and co-counsel, Appellant moves for an extension of 30 days in which to file Appellant's initial brief and consolidated designation.

WHEREFORE, Appellant prays for an Order granting a 30 day extension of time to file Initial Brief of Appellant and Consolidated Designation of Matter to be Included in the Record.

March 9, 2015

RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By:

JOHN HUGHES COOPER, ESQUIRE

Federal Court ID 298

South Carolina Bar 1387

State Bar of Georgia 185986

1476 Ben Sawyer Blvd. Ste. 7

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ATTORNEYS FOR APPELLANT

Other Counsel of Record:

Peter A. Kouten, Esquire

Kouten Law Firm, LLC

P.O. Box 340

Johns Island, SC 29457

843-670-3919

(Attorney for Respondent)

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Appellate Case No. 2014-002020

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BETTY FISHERAppellant

v.

BESSIE HUCKABEE.....Respondent

PROOF OF SERVICE

I certify that I have served the foregoing **Appellant’s Motion for Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record** upon Respondent Bessie Huckabee by depositing a copy of it in the United States Mail, postage prepaid, on March 9, 2015, addressed to her attorney of record Peter A. Kouten, Esquire, P.O. Box 340, Johns Island, SC 29457.

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SC Court of Appeals

March 9, 2015

RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By: 
JOHN HUGHES COOPER, ESQUIRE

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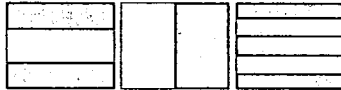
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ATTORNEYS FOR APPELLANT

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March 9, 2015

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
Attn: Ms. Ella Calvert

Re: BETTY FISHER, Appellant v. BESSIE HUCKABEE, Respondent
Appellate Case No. 2014-002020

Dear Ella:

Enclosed for filing please find the original and six copies of Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record, Proof of Service, and a check for the \$25.00 Motion Fee.

Also enclosed please find a copy of our filing for date stamping and return to us in the enclosed envelope.

Thank you for your assistance with this matter.

Best regards.

Very truly yours,

John Hughes Cooper

Enclosures: Original
6 copies
Proof of Service
\$25.00 check
Date stamp copies
Return envelope

cc: Peter A. Kouten, Esquire

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WE COVER THE WATERFRONT

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