

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

**RECEIVED**  
APR 15 2015  
SC Court of Appeals

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Case No 2014-002410

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Raymond D. Hobby, Respondent

vs

Mary T. Hobby, Appellant

vs

Frances B. Knowlton, individually and as trustee, Respondent

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**APPELLANT'S MOTION FOR EXTENSION OF TIME  
TO FILE REPLY BRIEF**

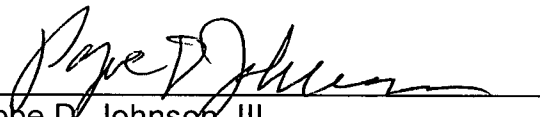
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Appellant Mary T. Hobby hereby moves pursuant to Rule 240, SCACR, for an extension of time in which to file her Reply Brief to Respondent Frances B. Knowlton's Initial Brief

Appellant's Reply Brief is due to be filed on April 20, 2015. Due to the current professional and personal schedules of Appellant's counsel between now and the April

20, 2015 deadline, Appellant respectfully moves to extend the deadline to file her Reply Brief for an additional 10 days. Such extension would make the Appellant's Reply Brief due no later than April 30, 2015. Appellant further asks that all deadlines be stayed pending a ruling on this motion.

Counsel for Respondents Raymond D. Hobby and Frances B. Knowlton have graciously consented to Appellant's extension request, as evidenced by the attached email correspondence.

  
Pope D. Johnson, III  
Attorney at Law  
1230 Richland Street  
Columbia, SC 29201  
803-799-9791  
803-253-6084 (Fax)  
[pope@popejohnsonlaw.com](mailto:pope@popejohnsonlaw.com)  
**Attorney for Appellant**

Columbia, South Carolina  
April 15, 2015

## Pope Johnson

**From:** Dave Howser [rdhowser@hnblaw.com]

**Sent:** Tuesday, April 14, 2015 3:35 PM

**To:** Pope Johnson, Ben Bruner

**Subject:** RE: Hobby v. Hobby and Knowlton

No objection

---

**From:** Pope Johnson [mailto:pope@popejohnsonlaw.com]

**Sent:** Tuesday, April 14, 2015 3:34 PM

**To:** Ben Bruner, Dave Howser

**Subject:** Hobby v. Hobby and Knowlton

Do you have any objection to me having 10 more days in which to respond to Dave's brief? This would mean a response date not later than April 30, 2015. Please advise.

Pope D. Johnson, III  
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803-730-1078 (cell)  
803-253-6084 (fax)

## Pope Johnson

**From:** Ben Bruner [BBruner@brunerpowell.com]  
**Sent:** Tuesday, April 14, 2015 3:51 PM  
**To:** Pope Johnson  
**Cc:** Dave Howser  
**Subject:** RE: Hobby v. Hobby and Knowlton

I have no objection to that

Benjamin C. Bruner

### **BRUNERPOWELL**

BRUNER, POWELL, WALL & MULLINS, LLC  
P O Box 61110  
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**From:** Pope Johnson [mailto:pope@popejohnsonlaw.com]  
**Sent:** Tuesday, April 14, 2015 3:50 PM  
**To:** Ben Bruner; Dave Howser  
**Subject:** RE: Hobby v. Hobby and Knowlton

Court of Appeals 2014 case

Pope D. Johnson, III  
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**From:** Ben Bruner [mailto:BBruner@brunerpowell.com]  
**Sent:** Tuesday, April 14, 2015 3:36 PM  
**To:** Pope Johnson; Dave Howser  
**Subject:** RE: Hobby v. Hobby and Knowlton

Which of the myriad of cases in this dispute are we talking about?

4/14/2015

Benjamin C Bruner

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**From:** Pope Johnson [<mailto:pope@popejohnsonlaw.com>]  
**Sent:** Tuesday, April 14, 2015 3:34 PM  
**To:** Ben Bruner; Dave Howser  
**Subject:** Hobby v. Hobby and Knowlton

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Case No 2014-002410

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Raymond D. Hobby

Respondent

vs

Mary T. Hobby . . .

Appellant

vs

Frances B. Knowlton, individually and as trustee,

Respondent

---

**PROOF OF SERVICE**

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I, Sherry W. Wise, of Pope D. Johnson, III, Attorney at Law, hereby certify that I have served Benjamin C. Bruner, attorney for Respondent Raymond D. Hobby, and R. Davis Howser, attorney for Respondent Frances B. Knowlton, with the following pleadings by mailing a copy of same, postage prepaid and return address clearly indicated, to them at the following addresses on the 15<sup>th</sup> day of April, 2015:

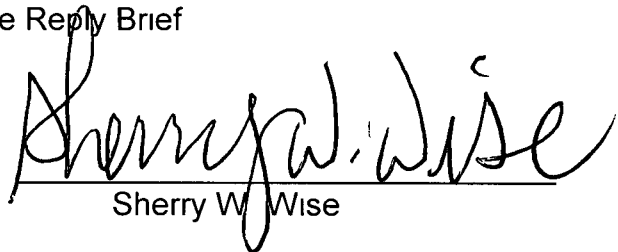
**COUNSEL SERVED:**

Benjamin C. Bruner, Esquire  
Bruner Powell Wall & Mullins, LLC  
P O Box 61110  
Columbia, SC 29260-1110

R Davis Howser, Esquire  
Howser Newman & Besley, LLC  
P O Box 12009  
Columbia, SC 29211

**PLEADINGS:**

Appellant's Motion for Extension of Time to File Reply Brief



Sherry W. Wise

POPE D. JOHNSON, III  
Attorney at Law

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Direct Dial: 803-376-8965  
E-Mail: [pope@popejohnsonlaw.com](mailto:pope@popejohnsonlaw.com)

April 15, 2015

**(Via Hand Delivery)**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RECEIVED**

APR 15 2015

**SC Court of Appeals**

Re Raymond D Hobby v Mary T Hobby  
Case No 2014-002410

Dear Ms Kitchings

Enclosed herewith are the original and a copy of the Appellant's Motion for Extension of Time to File Reply Brief of Matter regarding the above-referenced action. Also enclosed is a check in the amount of \$25 00 for the filing fee. Please file the original Motion and clock and return the additional copy to me.

With a copy of this letter to Benjamin C Bruner, attorney for Respondent Raymond D Hobby, and R Davis Howser, attorney for Respondent Frances B Knowlton, I am serving a copy of the Motion upon them.

Sincerely,

  
Pope D Johnson, III

PDJIII/sww  
Enclosures

cc Benjamin C Bruner, Esquire  
R Davis Howser, Esquire