

76104

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
DeAndrea G. Benjamin, Family Court Judge

RECEIVED

MAY 27 2015

SC Court of Appeals

Trial Court Case No. 2001-CP-40-04203
Appellate Case No. 2014-001826

Edwin M. Smith, Jr.,

Appellant,

v.

David Fedor,

Respondent,

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent, David Fedor, by counsel, respectfully moves for a 30-day extension of the deadline for serving and filing Respondent's initial brief and designation of matter to be included in the record on appeal, and in support of this motion states as follows:


By order dated April 30, 2015, the undersigned was substituted as counsel for Respondent's prior attorney, and the deadline for Respondent's initial brief and designation was established thirty days from the date of the order. Accordingly, the initial brief and designation are due to be served and filed Monday, June 1, 2015.

Since the entry of the Court's order on April 30, 2015, a close family member of undersigned counsel has experienced an unexpected serious medical issue. As a result, the undersigned has missed a substantial amount of time from work and will not be able to complete the Respondent's initial brief and designation of matter by the June 1 deadline. For this reason, counsel respectfully asks this Court to grant a 30-day extension of the deadline for filing Respondent's initial brief and designation of matter. This request is not made for the purpose of delay but because of the disruption of counsel's work schedule caused by medical necessity.

The undersigned has not previously requested an extension of this deadline, and no prejudice will result to Appellant from a grant of this extension request.

Wherefore, Respondent's counsel respectfully moves this Court for an extension of the deadline for Respondent's initial brief and designation of matter, to July 1, 2015.

Respectfully submitted,



Katherine Carruth Goode
229 South Congress Street
P.O. Box 1175
Winnsboro, South Carolina 29180
Telephone: (803) 799-4440
South Carolina Bar number 008951

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
DeAndrea G. Benjamin, Family Court Judge

RECEIVED

MAY 27 2015

Trial Court Case No. 2001-CP-40-04203
Appellate Case No. 2014-001826

SC Court of Appeals

Edwin M. Smith, Jr.,

Appellant,

v.

David Fedor,

Respondent,

PROOF OF SERVICE

I hereby certify that I have served a copy of the Motion for Extension of Time upon Appellant, by mail to Appellant's counsel, William M. Hogan and James R. Gilreath, The Gilreath Law Firm, P.A., P.O. Box 2147, Greenville, South Carolina 29602, and Edward L. Grimsley and Eric Wm. Ruschky, Grimsley Law Firm, LLC, P.O. Box 11682, Columbia, South Carolina 29211, on May 27, 2015.



Katherine Carruth Goode
229 South Congress Street
P.O. Box 1175
Winnsboro, South Carolina 29180
Telephone: (803) 799-4440
South Carolina Bar number 008951