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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Hon. S. Jackson Kimball, III
Master in Equity

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JUN 05 2015

SC Court of Appeals

Appellate Case No. 2014-000730

EARL DUKES,APPELLANT

vs.

KENNITH W. FARRELL, MARY C. FARRELL and
MARTIN BROGDONOVICH, Defendants,

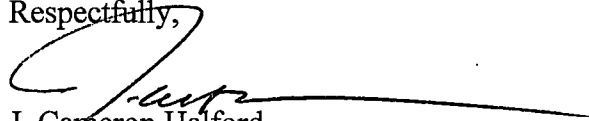
Of whom

KENNITH W. FARRELL and MARY C. FARRELL are theRESPONDENTS

APPELLANT MOTION
FOR EXTENSION OF TIME TO FILE FINAL REPLY BRIEF

Appellant counsel moves the court to extend the filing deadline for the final reply brief of Appellant by thirty (30) days for good cause shown due to personal circumstances affecting Appellant Counsel, by and with consent of opposing counsel who indicates no objection to the relief sought by way of this motion.

Respectfully,



J. Cameron Halford
Halford Niemiec & Freeman, L.L.P.
238 Rockmont Drive
Fort Mill, South Carolina 29708
803-547-6618
803-547-6638 (fax)

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CERTIFICATE OF SERVICE

I hereby certify that I am the attorney for Appellants in the above captioned case and that I did on June 2, 2015 serve a copy of the foregoing APPELLANT MOTION TO EXTEND DEADLINE FOR FINAL APPELLANT BRIEF on the attorney for Respondent by email & U.S. mail, postage prepaid, addressed as follows:

John Martin Foster, Esq.
Post Office Box 106
Rock Hill, South Carolina 29731-6105

Attorney for Respondent

HALFORD NIEMIEC & FREEMAN, L.L.P.



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J. Cameron Halford, LLC ^
Matthew R. Niemiec, LLC
P. John Freeman, LLC

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June 2, 2015

South Carolina Court of Appeals
V. Claire Allen, Deputy Clerk
Post Office Box 11629
Columbia, South Carolina 29201

Re: Appeals Case No. 2014-000730 Earl Dukes v. Kenneth Farrell

Dear Ms. Allen:


Pursuant to the court's letter of May 28, 2015 and my call to the court today, June 2, 2015, I am here enclosing a motion for extension to file the final reply brief of appellant. The motion is made due to personal circumstances and the fact that I have a trial pending late this week in Equity Court in York County with a date certain. I have discussed the matter with opposing counsel Martin Foster who indicates no objection, as set forth in the motion.

If approved I would like thirty days extension, thru ~~June~~ ^{July} 28, 2015. Again, this is primarily due to unforeseen develops of a personal and private nature involving issues I have to discuss with the Office of Disciplinary Counsel.

Thank you for your consideration.

With kind personal regards, I remain

Sincerely,


J. Cameron Halford

JCH:tml
cc: Martin Foster (via e-mail)

^ ARBITRATOR & MEDIATOR

Halford, Niemiec & Freeman
238 Rockmont Drive
Fort Mill SC 29708

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