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JUN 26 2015

STATE OF SOUTH CAROLINA
In the Court of Appeals

SC Court of Appeals

APPEAL FROM BERKELEY COUNTY

Master in Equity and Special Circuit Court Judge

The Honorable Marvin H. Dukes, III

Case No: 2004-DR-10-1564

Solomon Johnson, et al.....Respondent

v.

The Heirs or Divisees of Solomon White, et al.....Appellant

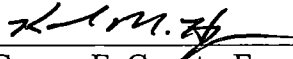
**APPELLANT MOTION FOR 30-DAY EXTENSION
OF TIME TO FILE AN INITIAL BRIEF**

The Appellant, who received the Transcript of Record on May 6, 2015 and the Exhibits on June 4, 2015, hereby moves for an Order allowing the Appellant an additional 30 days to file the Initial Brief and Designation of Matter. The grounds for this Motion are that the Appellant's Counsel needs additional time to prepare the Initial Brief and Designation of Matter due to: (a) the fact that several Court appearances were scheduled during the time the undersigned had to prepare the necessary Brief; and (b) the demands of his law practice have consumed his time to prevent him from preparing the necessary brief.

Appellant's Counsel, has consulted with the Respondent's Counsel in regard to this Motion, and has been informed that the Respondent's Counsel has no objection to this Motion.

Respectfully submitted,

COUNTS & HUGER, LLC

By: 
George E. Counts, Esquire
Kelvin M. Huger, Esquire
P.O. Box 80399
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843-573-0143 Ph
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ATTORNEY FOR RESPONDENT

June 24, 2015
Charleston, SC

COUNTS & HUGER, LLC
ATTORNEYS AT LAW

Attorneys

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SC Court of Appeals
June 24, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Solomon Johnson, et. al., Respondent, vs. The Heirs or Devisees of Solomon White, et. al., Appellants.

Case No. 2011-CP-07-5211

Appellate Case No. 2014-002220

Dear Clerk Kitchings:

Enclose please find Appellant's Motion for 30-Day Extension of Time to File an Initial Brief and Designation of Matter along with the filing fee.

I received the transcript on May 6, 2015. The transcript did not include the exhibits. The exhibits were requested from the Beaufort County Clerk of Court on April 29, 2015. During the trial in the lower Court, Plaintiff's entered fifty-one (51) exhibits, one Defendant entered fourteen (14) exhibits, one Defendant entered one (1) exhibit and the Court entered one (1) exhibit. It took several weeks for the Clerk's Office to copy most of the exhibits because of the size of the plats and the need to copy them in segments and then tape the segments together. The Clerk's Office, however, was not able to copy two of the plats because they were mounted on cardboard. On June 4, 2015, I went to the Beaufort County Clerk's Office to pick up the copy of the exhibits and to find a place to copy the exhibits that the Clerk's Office was not able to copy. I have had the transcripts and a complete copy of the exhibits as of June 4, 2015.

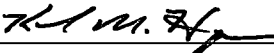
With kind regards,



George E. Counts, Esq.
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(843) 573-0143
Attorney for Appellants

I certify that I served a copy of this letter on the South Carolina Office of Court Administration by depositing a copy of it in the United States Mail, postage prepaid, on June 24, 2015, addressed to 1015 Sumter Street, Suite 201, Columbia, South Carolina 29201, on the Honorable Marvin H. Dukes, III, Beaufort County Master in Equity, by depositing a copy of it in the United States Mail, postage prepaid, on June 24, 2015, addressed to 102 Ribaut Road, Room 212, Beaufort, South Carolina 29202, Mrs. Deborah Thomas, Court Reporter for the Honorable Marvin H. Dukes, III, Beaufort County Master in Equity, by depositing a copy of it in the United States Mail, postage prepaid, on June 24, 2015, addressed to 102 Ribaut Road, Room 212, Beaufort, South Carolina 29202, on J. Thomas Mikell, Esquire of Mikell, Weidner, Wegmann & Harper, LLC by depositing a copy of it in the United States Mail, postage prepaid, on June 24, 2015, addressed to Post Office Box 1727, Beaufort, South Carolina 29901-1727, Harold A. Boney, Jr., Esquire of Harold A. Boney Law Offices, Post Office Box 1151, Beaufort, South Carolina, 29901-1151, and R. Bruce Marshall, Jr., Esquire by depositing a copy of it in the United States Mail, postage prepaid, on June 24, 2015, addressed to Post Office Box 2403, Beaufort, South Carolina 29901-2403.

June 24, 2015

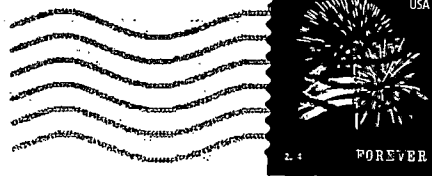


Kelvin M. Huger, Esq.

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The Honorable Jenny Abbott Kitchings
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South Carolina Court of Appeals
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