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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 26 2015

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

SC Court of Appeals

Benjamin H. Culbertson
Circuit Court Judge

Case No. 2012-CP-29-1187

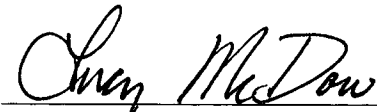
Kenneth R. Gainey.....Appellants

v.

Timothy M. Gainey.....Respondent.

MOTION FOR EXTENSION OF TIME


Respectfully submitted,



Lucy L. McDow
P.O. Box 767
Rock Hill, South Carolina 29731-6767
(803) 327-1700
ATTORNEY FOR RESPONDENT

June 18, 2015

I consent:

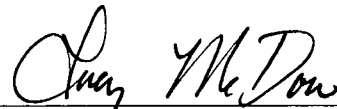

Philip E. Wright
408 North Main Street
Lancaster SC 29720
(803) 286-4343
ATTORNEY FOR THE APPELLANT

ORIGINAL

The respondent's trial counsel, Trent M. Grissom, has changed law firms since the trial of this case and can no longer represent the respondent. Contemporaneously with this motion, Lucy L. McDow is moving to be substituted as counsel for the respondent, ordering a copy of the trial transcript, and obtaining trial counsel's file.

Because of the time required to take those steps and for the respondent's new counsel to become familiar with the record, respondent moves for a 30-day extension of time, until August 3, 2015, to serve the respondent's initial brief. No extensions have previously been requested by respondent.

The appellant's counsel has consented to this extension.



Lucy L. McDow
P.O. Box 767
Rock Hill, South Carolina 29731
(803) 327-1700
Attorney for Respondent

June 18, 2015

THE STATE OF SOUTH CAROLINA
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APPEAL FROM LANCASTER COUNTY
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Benjamin H. Culbertson
Circuit Court Judge

Case No. 2012-CP-29-1187

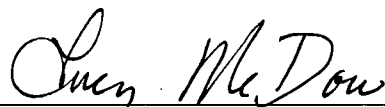
Kenneth R. Gainey.....Appellant

v.

Timothy M. Gainey.....Respondent

PROOF OF SERVICE

I certify that I have served a copy of the Motion for Extension of Time on the appellant, Kenneth R. Gainey, by mailing a copy by United States Mail, postage prepaid, on June 24, 2015, addressed to his attorney of record, addressed as follows: Philip E. Wright, 408 North Main Street, Lancaster SC 29720.



Lucy L. McDow
P.O. Box 767
Rock Hill, South Carolina 29731
(803) 327-1700
Attorney for Respondent

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JUN 26 2015

SC Court of Appeals

Lucy L. McDow
Attorney
P.O. Box 767, 514 Oakland Avenue
Rock Hill, SC 29731
Telephone: (803) 327-1700; Fax: (803) 327-4200
LucyLMcDow@mcdowlaw.com

June 24, 2015

RECEIVED
JUN 26 2015
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211

RE: Kenneth R. Gainey vs. Timothy M. Gainey
Civil Action No. 2012-CP-29-1187
Appellate Case No. 2015-000904

Dear Ms. Kitchings:

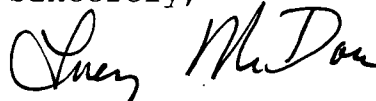
Enclosed for filing are the originals and six copies of the following two motions, to which the appellant's attorney has kindly consented:

1. Motion for Substitution of Counsel for the respondent; and
2. Motion for Extension of Time to file the respondent's initial brief.

Also enclosed are proofs of service and the filing fees totaling \$50.00. I would appreciate the return of the clocked copies.

Thank you.

Sincerely,

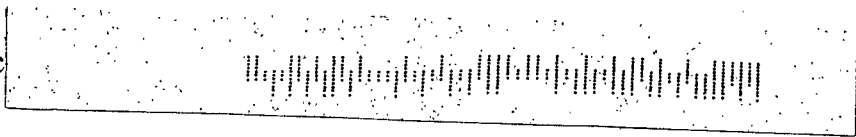


Lucy L. McDow

Enclosures
cc w/enc:

Philip E. Wright
Client

Lucy L. Mc
Attorney
P.O. Box 767
Rock Hill SC 29731-6767



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JUN 26 2015
SC Court of Appeals



The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211