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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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AUG 11 2015

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

SC Court of Appeals

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2014-002028

Circuit Case No. 2011-CP-10-7821

LISA FISHER ..... Appellant

v.

BESSIE HUCKABEE ..... Respondent

**RESPONDENT'S MOTION TO FILE OUT OF TIME, MOTION FOR EXTENSION OF  
(30) DAYS TO RESPOND UNDER RULE 224 SCACR TO APPELLANT'S MOTION TO  
STRIKE AND MOTION TO AMEND DESIGNATION OF MATTERS TO BE  
INCLUDED IN THE RECORD OF RESPONDENT**

PETER A. KOUTEN, ESQUIRE  
PO Box 340  
Johns Island, SC 29457  
(843) 789-9614; fax (843) 559-3162  
pkouten@gmail.com  
(Attorney for Respondent as  
Personal Representative for the  
Estate of Alice Shaw Baker)

COMES NOW Bessie Huckabee, Respondent in the above appeal, pursuant to Rule 234(b), SCACR, and moves for a (30) day extension of time to file Return to Appellant's Motion to Strike, (30) day extension to respond otherwise under Rule 224, SCACR, and Motion to Amend Designation of Matters to Be Included in the Record of Respondent.

On July 22, 2015, Appellants filed their Reply Brief. The Record on Appeal is expected for filing and service on August 23, 2015 pursuant to Rule 210, SCACR. Also on July 22, 2015, Appellants filed Motion to Strike portions of Respondent's Designation of Matters to be Included in the Record. On July 31, 2015, Appellants filed a Motion seeking Extension of Time to File and Serve Record on Appeal, said request being open-ended and taking effect only after the Motion to Strike has been decided.

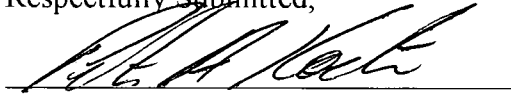
Appellant's Motion to Strike was served by mail with Appellant's Reply Brief. Counsel for Respondent did not take note of the Motion to Strike until he reviewed the Reply Brief of Appellants on August 6, 2015.

Respondent seeks an extension of (30) days and seeks to file out of time as this Motion has been submitted 15 days from the date recorded on Appellant's cover letter and Proof of Service and is 5 days out of time.

Respondent moves for an extension of (30) days from August 1, 2015 in which to respond under Rule 224 SCACR to Appellant's Motion to Strike and Amend her Designation of Matters to be Included in the Record.

WHEREFORE, Respondent prays that this Honorable Court Grant Extension of (30) days from August 1, 2015 in which to respond under Rule 224 SCACR to Appellant's Motion to Strike and Amend her Designation of Matters to be Included in the Record.

Respectfully Submitted,



Peter A. Kouten, Esquire  
PO Box 340  
Johns Island, SC 29457  
pkouten@gmail.com  
843-789-9614  
Attorney For Respondent

August 6, 2015  
Charleston, South Carolina

Counsel Served:

John Hughes Cooper, Esquire  
1476 Ben Sawyer Blvd., Ste. 7  
Mt. Pleasant, SC 29464

THE STATE OF SOUTH CAROLINA

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LISA FISHER ..... Appellant

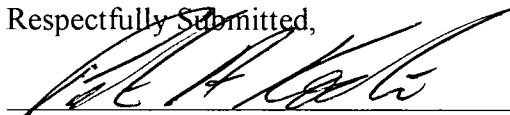
v.

BESSIE HUCKABEE ..... Respondent

PROOF OF SERVICE

I certify that I have served the foregoing Respondent's Motion to File Out of Time, Motion for Extension of (30) days to respond under Rule 224 SCACR to Appellant's Motion to Strike and Motion to Amend Designation of Matters to Be Included in the Record of Respondent upon Appellant Betty Fisher by depositing a copy of it in the United States Mail, postage prepaid, on August 6, 2015, addressed to her attorney of record John Hughes Cooper, Esquire, 1476 Ben Sawyer Blvd., Ste. 7, Mt. Pleasant, SC 29464.

Respectfully Submitted,



Peter A. Kouten, Esquire  
PO Box 340  
Johns Island, SC 29457  
pkouten@gmail.com  
843-789-9614  
Attorney For Respondent

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SC Court of Appeals

Mailing address:  
PO Box 340  
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www.koutenlaw.com

August 6, 2015

South Carolina Court of Appeals  
ATTN: V. Claire Allen  
P.O. Box 11629  
Columbia, SC 29211

**Re: Lisa Fisher, Appellant v. Bessie Huckabee, Respondent**  
**Appellate Case No.: 2014-002028**

Dear Ms. Allen,

Please find enclosed original and six copies of Respondent's Motion to File Out of Time, Motion for Extension of (30) days to respond under Rule 224 SCACR to Appellant's Motion to Strike and Motion to Amend Designation of Matters to Be Included in the Record of Respondent.

Also find enclosed Proof of Service, and check in the amount of \$25.00.

Please contact me if you have any questions regarding this filing.

Sincerely,

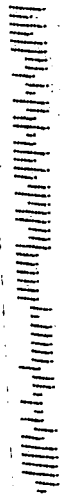


Peter Kouten

W/Enclosures

CC: Jonn Hughes Cooper, Esq.

Kouten Law Firm, LLC  
PO Box 340  
Johns Island, SC 29457



South Carolina Court of Appeals  
ATTN: V. Claire Allen  
P.O. Box 11629  
Columbia, SC 29211



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