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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

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SC Court of Appeals

Case No. 2014-CP-26-1665
Appellate Case No. 2015-000680

Emily Carlson and Alice Preyer, Petitioners,

v.

John C. Dockery, III, Respondent.

In re Emily Cheshire Dockery,
Of Whom Emily Carlson and Alice Preyer..... are the Respondents,
and
Emily Cheshire Dockery..... is the Appellant.

**MOTION FOR EXENSION OF TIME TO FILE INITIAL BRIEF (RULE 208) AND
DESIGNATION OF MATTER ON APPEAL (RULE 209) BY GUARDIAN AD LITEM
FOR EMILY CHESHIRE DOCKERY**

To All Parties:

Appellant Emily Cheshire Dockery filed a Notice of Appeal on March 27, 2015, appealing the decision of the Honorable Larry B. Hyman, Jr., dated February 4, 2015 and filed on February 23, 2015. Appellant Emily Cheshire Dockery served her brief upon the parties on


August 10, 2015. Pursuant to S.C. Code Ann. § 62-1-308(e) (as amended effective Jan. 1, 2014), responsive briefs to Appellant are due on September 10, 2015.

The Guardian *ad Litem* and Attorney for Emily Cheshire Dockery respectfully request that the Court grant a thirty-day extension of the Respondent's responsive filing deadlines. This Motion is based on the following grounds:

- (1) This is the first request for an extension of time in this appeal;
- (2) This Motion is being made prior to the expiration of the deadline;
- (3) In order to be cost efficient, the Guardian *ad Litem* for Emily Cheshire Dockery is preparing the appeal; however, I have an unusually heavy caseload plus an unexpected death in the family in the past month.

MOORE, JOHNSON & SARANITI LAW FIRM, P.A.

By: _____


V. Lee Moore
S.C. Bar No. 9777
P.O. Box 14737
Surfside Beach, SC 29587
Telephone: (843) 650-9757
Email: moore@grandstrandlawyers.com

September 2, 2015

Surfside Beach, South Carolina

GUARDIAN AD LITEM FOR
EMILY CHESHIRE DOCKERY

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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PROOF OF SERVICE

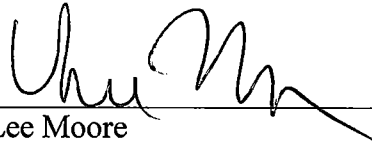
I HEREBY CERTIFY that I have served the **MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF (RULE 208)** and **DESIGNATION OF MATTER ON APPEAL (RULE 209) BY GUARDIAN AD LITEM FOR EMILY CHESHIRE DOCKERY**, by depositing copies of it in the United States Mail, postage prepaid, addressed to the parties below:

Thomas C. Brittain, Esq.
Marry Madison Brittain Langway, Esq.
4614 Oleander Drive
Myrtle Beach, SC 29577

James F. McCrackin, Esq.
P O Box 3939
Myrtle Beach, SC 29578

MOORE, JOHNSON & SARANITI LAW FIRM, P.A.

By:



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September 2, 2015

Surfside Beach, South Carolina



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Sarah A. Johnson
Also member of NC and NY Bar
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Also member of Ohio Bar
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P.O. Box 14737
Surfside Beach, SC 29587-4737
Phone: 843-650-9757
Fax: 843-650-9747
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September 2, 2015

VIA: FEDERAL EXPRESS

The Honorable Jenny A. Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

SEP 03 2015
SC Court of Appeals

RE: Emily Carlson and Alice Preyer, Petitioners,
v.
John C. Dockery, III, Respondent.

In Re: Emily Cheshire Dockery
Of Whom Emily Carlson and Alice Preyer are the Respondents,
and
Emily Cheshire Docker is the Appellant.

Appellate Case No. 2015-000680

Our File No. E187LM

Dear Ms. Kitchings:

Enclosed herewith please find *Motion for Extension of Time to File Initial Brief (Rule 208)* and *Designation of Matter on Appeal (Rule 209)* by *Guardian Ad Litem for Emily Cheshire Dockery* and *Proof of Service*, along with a self-addressed stamped envelope for your convenience in returning a clocked copy for same, in reference to the above referenced action.

With kindest regards, I remain

Very Truly Yours,

V. Lee Moore

VLM/bv

Enclosures: as stated.

Cc: Thomas C. Brittain, Esquire
Mary Madison Brittain Langway, Esquire
James F. McCrackin, Esquire

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ELIZABETH SARANITI
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TO HONORABLE JENNY A. KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890

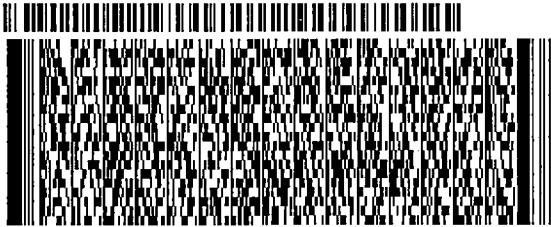
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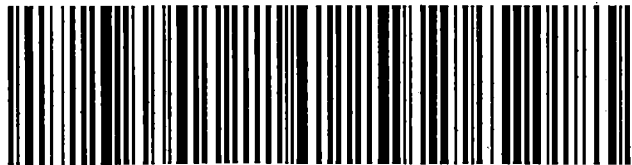
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SC Court of Appeals

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