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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

Appellate Case No. 2014-001249
Case No. 2012-CP-26-03804

RECEIVED
SEP 04 2015
SC Court of Appeals

Mark Kelley, Respondent,

v.

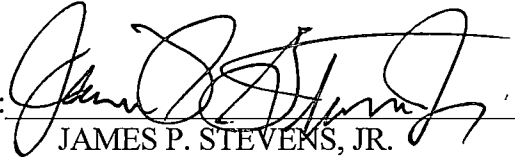
David Wren and Sun Publishing Co., Inc., d/b/a *The Sun News*, Appellants.

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENT'S REPLY TO
AMICUS CURIAE BRIEFS**

Respondent's Reply to *Amicus Curiae Briefs* is due on September 23, 2015. I have scheduled a vacation out of the country for September 2-10, 2015, and have paid for the same. I have three *Amicus* briefs to respond to and that does not give me sufficient time to read the same and do the necessary research. I also have two days of hearings and one day of depositions.

The attorney for the Respondent hereby requests this Court grant an additional 30-day extension of time in which to file the **Respondent's Reply to *Amicus Curiae Briefs***.

STEVENS LAW FIRM, P.C.

By: 

JAMES P. STEVENS, JR.

Post Office Drawer 127

Loris, S. C. 29569-0127

843.756.7652; 843.756.3785--Fax

Attorney for Respondent

September 1, 2015.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

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AFFIDAVIT OF JAMES P. STEVENS, JR.

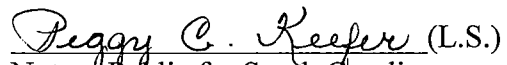
PERSONALLY appeared before me JAMES P. STEVENS, JR., who swears and affirms as follows:

1. I am the attorney for the Respondent in the above matter.
2. Respondent's Reply to *Amicus Curiae* Briefs is due September 23, 2015.
3. I have three *Amicus* briefs to respond to and that does not give me sufficient time to read the same and do the necessary research. I also have two days of hearings and one day of depositions.
4. Therefore, I would request that the Court grant me an additional 30 day extension of time in which to finalize and file Respondent's Reply to *Amicus Curiae* briefs.

Further the Affiant saith not.


JAMES P. STEVENS, JR.

SWORN to before me this
1st day of September, 2015.


Notary Public for South Carolina
My Commission expires: 12/04/2016

THE STATE OF SOUTH CAROLINA
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Larry B. Hyman, Jr., Circuit Court Judge

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SC Court of Appeals

Mark Kelley, Respondent,

v.

David Wren and Sun Publishing Co., Inc., d/b/a *The Sun News*, Appellants.

PROOF OF SERVICE

I certify that I have served the **Motion for Extension of Time to File Respondent's Reply to *Amicus Curiae* Briefs and Affidavit of James P. Stevens, Jr.**, by depositing a copy in the United States Mail, postage prepaid, on September 1, 2015, addressed to the attorneys of record:

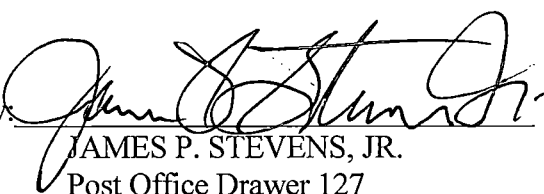
Mr. Jay Bender
Baker Ravenel Bender
Post Office Box 8057
Columbia, South Carolina 29202

Mr. Jonathan E. Buchan
Mr. William Grayson Lambert
McGuire Woods
Fifth Third Center, Suite 3000
201 North Tryon Street
Charlotte, North Carolina 28202

Mr. Edward T. Fenno
Fenno Law Firm, LLC
171 Church Street, Suite 160
Charleston, South Carolina 29401

Mr. Wallace K. Lightsey
Wyche Professional Association
44 East Camperdown Way
Greenville, South Carolina 29601-3512

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By: 
JAMES P. STEVENS, JR.
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843.756.7652
Attorney for Respondent

November 4, 2014

STEVENS LAW FIRM, P.C.

JAMES P. STEVENS (1920-2002)

JAMES P. STEVENS, JR.*
NATALIE S. STEVENS-GRAZIANI

*Certified Civil Mediator

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E-Mail: jim@stevens-law-firm.com
E-Mail: natalie@stevens-law-firm.com

September 1, 2015

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SC Court of Appeals

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

Re: *Mark S. Kelley v. David Wren and Sun Publishing Company, Inc., d/b/a The Sun News*
Civil Action No. 2012-CP-26-03804 - Appellate Case No. 2014-001249

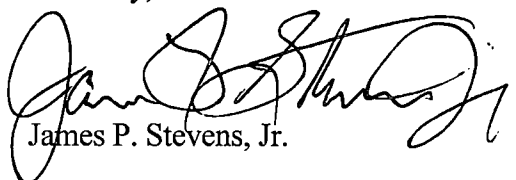
Dear Ms. Kitchings:

Enclosed for filing is the following:

1. Original and seven copies of a **Motion for Extension of Time to File Respondent's Reply to Amicus Curiae Briefs.**
2. **Affidavit of James P. Stevens, Jr.**
3. **Proof of Service** of the Motion on the Appellate.
4. A filing fee of \$25.

Please acknowledge receipt of this Motion by returning a clocked copy of the Motion in the enclosed envelope.

Sincerely,

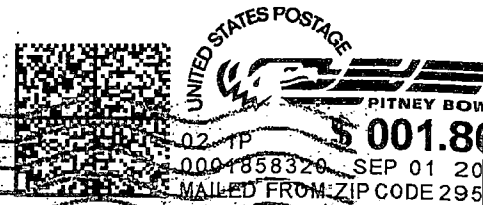
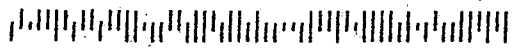


James P. Stevens, Jr.

JPSjr/pk

enclosures

cc: Mr. Jay Bender
Mr. Jonathan E. Buchan
Mr. William Grayson Lambert
Mr. Edward T. Fenno
Mr. Wallace K. Lightsey



COLUMBIA SC 292

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SC Court of Appeals

LAW OFFICES

STEVENS LAW FIRM, P.C.

POST OFFICE DRAWER 127

LORIS, SOUTH CAROLINA 29569-0127

TO:

Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
P. O. Box 11629
Columbia, SC 29211