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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Daniel B. Dorn, in his Capacity as the Parent and Natural Guardian of E.D., R.D., and Y.D., Appellant.

v.

Paul S. Cohen and Susan Cohen, individually and in their capacity as the Co-Conservators of the person of Abbie Ilene Dorn, a protected person and ward, and in their capacity as Co-Trustees of the Abbie Dorn Special Needs Trust, Respondents.

Paul S. Cohen, M.D. and Susan Cohen, Respondents,

v.

E.D., R.D. and Y.D., the Living Issue of Abbie Ilene Dorn and the South Carolina Department of Health and Human Services, Respondents below,

Of whom E.D., R.D. and Y.D., the Living Issue of Abbie Ilene Dorn are the Appellants,

and

The South Carolina Department of Health and Human Services is a Respondent.

In Re: The Abbie Dorn Special Needs trust.

Appellate Case No. 2015-000659

The Honorable Deadra L. Jefferson
Horry County
Trial Court Case No. 2013CP2608152, 2013CP2608139,
2014CP2601691, 2014CP2601744

MOTION FOR EXTENSION TO FILE RESPONDENTS' BRIEF

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SC Court of Appeals

MOTION FOR EXTENSION

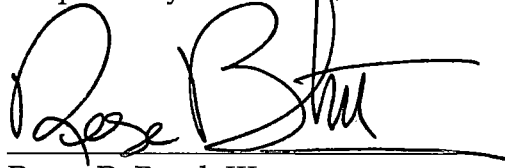
COME NOW the Respondents Paul S. Cohen, M.D., and Susan Cohen, who would respectfully request an extension of an additional thirty (30) days in which to file their initial Reply Brief in the captioned matter. The Cohen Respondents' initial Reply Brief is currently calendared with the Court for a due date of September 8, 2015. This request for extension is based upon the following:

- (1) The addressed utilized for service by Appellant's counsel for their initial brief upon these Respondents: Post Office Box 15358, Myrtle Beach, SC 29687, is not the correct address for the undersigned counsel and Davis & Boyd, LLC. Service to the addressed utilized delayed the delivery of the Appellant's Initial Brief to the undersigned counsel.
- (2) The undersigned counsel has prior and existing travel plans with his family scheduled for the Labor Day weekend and the following Tuesday which coincides with the current deadline for Respondents to file their initial Reply Brief.

The undersigned counsel for the Respondent attempted to discuss this Motion with the Appellant's counsel, John A. Massalon, Esq., prior to filing, but was not able to reach him.

September 2, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Reese Boyd", written over a horizontal line.

Reese R. Boyd, III

Bret H. Davis

DAVIS & BOYD, LLC

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PAUL S. COHEN, M.D., AND SUSAN
COHEN, Individually and in their
Capacity as the Co-Conservators of the
Person of Abbie Ilene Dorn, a Protected
Person and Ward, and in their Capacity
as Co-Trustees of the Abbie Dorn
Special Needs Trust

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SC Court of Appeals

I certify that I have served the Designation of Matters to be Included in the Record on appeal by depositing a copy of it in the United States Mail, postage prepaid, on September 2, 2015, addressed to:

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CAPACITY AS THE PARENT AND
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R.D., AND Y.D.

September 2, 2015



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COHEN, Individually and in their
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and Ward, and in their Capacity as Co-Trustees
of the Abbie Dorn Special Needs Trust

BRET H. DAVIS, JD*, CPA

**Licensed in SC and NC*

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September 2, 2015

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SC Court of Appeals

via Federal Express

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

**Re: Daniel B. Dorn, in his Capacity as the Parent and Natural Guardian of
E.D., R.D., and Y.D., Appellant**

v.

**Paul S. Cohen and Susan Cohen, individually and in their capacity as
the Co-Conservators of the person of Abbie Ilene Dorn, a protected
person and ward, and in their capacity as Co-Trustees of the Abbie
Dorn Special Needs Trust,**

Respondents

Paul S. Cohen, M.D. and Susan Cohen, Respondents,

v.

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Carolina Department of Health and Human Services, Respondents**

below

**Of whom E.D., R.D. and Y.D., the Living Issue of Abbie Ilene Dorn are
the Appellants**

and

**The South Carolina Department of Health and Human Services is a
Respondent.**

In re: The Abbie Dorn Special Needs Trust

Appellate Case No.: 2015-00659

Our File Number: 010.033.c

Dear Ms. Kitchings:

I enclose for filing in connection with the above-referenced matter, an original and seven (7) copies of the following:

The Honorable Jenny A. Kitchings
September 2, 2015
Page 2 of 2

- (1) Respondents Paul S. Cohen, M.D. and Susan Cohen's Motion for Extension with respect to the filing of their initial reply brief; and
- (2) Proof of Service with respect to same;

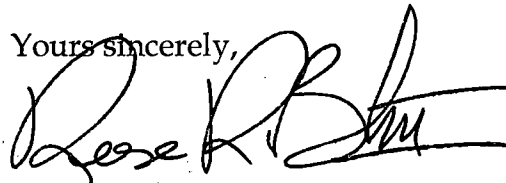
along with our check in the amount of \$25.00, as filing fee for same.

Please file the original motion, and return one of the file-stamped copies to me in the self-addressed, stamped envelope, which is also included for the Court's use.

If there are questions or if additional information is needed, please do not hesitate to contact me at any time.

With kind regards, I remain,

Yours sincerely,

A handwritten signature in black ink, appearing to read "Reese R. Boyd, III". The signature is stylized with a large, sweeping initial "R" and "B".

Reese R. Boyd, III

RRB/pw

Encls.

cc: John A. Massalon, Esq.
Virginia Lee Moore, Esq.
Lynette Rogers Hedgepath, Esq.
Shealy B. Reibold, Esq.
John Kachmarsky, Esq.
Daniel S. Slotchiver, Esq.
Bret H. Davis, Esq.

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SUITE 201
MYRTLE BEACH, SC 29577
UNITED STATES US

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TO THE HONORABLE JENNY A. KITCHINGS
CLERK OF COURT, SC COURT OF APPEALS
1015 SUMTER STREET #5

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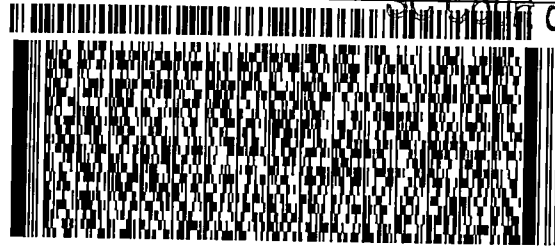
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COLUMBIA SC 29201

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SC Court of Appeals

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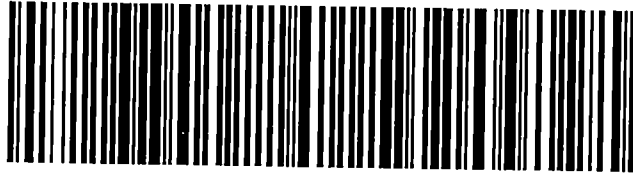
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