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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2013-CP-30-3513

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SEP 21 2015

SC Court of Appeals

Kathleen Lollis and Linda Campbell .....Appellants/Respondents,

vs.

Lisa Dutton, Dennis Dutton, and Kelsey Dutton.....Respondents/Appellants,

**MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANTS INITIAL BRIEF  
AND DESIGNATION OF MATTER**

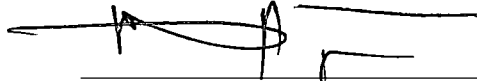
Kathleen Lollis and Linda Campbell, Appellants, hereby move, pursuant to Rule 240 of the South Carolina Appellate Court Rules, for an extension of time in which to file Appellants Initial Brief and Designation of Matter to be included on the Record on Appeal. Currently, Appellants Initial Brief and Designation of Matter are due on October 8, 2015. Appellants base their motion on the following grounds:

1. The undersigned was not trial counsel in this matter and needs additional time to become familiar with the file and consult with his clients regarding the matters to be addressed on appeal;
2. The transcript of record from the trial in this case exceeds 500 pages and will take a substantial amount of time to carefully read in order to thoroughly address the issues on appeal; and
3. The undersigned has consulted with opposing counsel regarding the request for an extension of time and opposing counsel has no objection to the request.

For these reasons, Appellants respectfully request that this Court extend the deadline of filing and serving Appellants Initial Brief and Designation of Matter until November 7, 2015. Appellants further request that the current deadline be stayed during the pendency of this motion.

September 16, 2015

TURNER & BURNEY, P.C.



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Matthew P. Turner  
S.C. Bar No.: 71719  
105 West Public Square  
Post Office Box 668  
Laurens, South Carolina 29360  
(864) 984-6565  
Attorney for Appellants/Respondents

Other Counsel of Record:

John R. Ferguson, Esquire  
Post Office Box 286  
Laurens, South Carolina 29360  
(864) 984-2126  
Attorney for Respondents/Appellants

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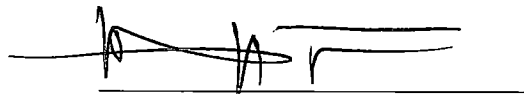
Lisa Dutton, Dennis Dutton, and Kelsey Dutton.....Respondents/Appellants,

**PROOF OF DELIVERY**

I certify that I have served a copy of the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter on Lisa Dutton, Dennis Dutton, and Kelsey Dutton, by depositing a copy of the same in the United States Mail, with postage prepaid, on September \_\_, 2015, addressed to their attorney of record, John R. Ferguson, Esquire, and mailed to his address below:

John R. Ferguson, Esquire  
Post Office Box 286  
Laurens, South Carolina 29360

TURNER & BURNEY, P.C.



Matthew P. Turner  
S.C. Bar No.: 71719  
105 West Public Square  
Post Office Box 668  
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(864) 984-6565  
Attorney for Appellants

September 16, 2015

**TURNER &  
BURNEY, PC**  
Attorneys at Law

J. Michael Turner, Sr.  
Rhett D. Burney  
Matthew P. Turner

Reply to:

PO Box 668  
Laurens, SC 29360

September 16, 2015

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SC Court of Appeals

Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

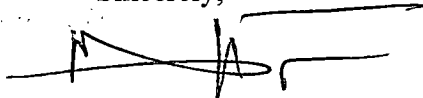
RE: Kathleen Lollis and Linda Campbell vs. Lisa Dutton, Dennis Dutton, and Kelsey Dutton  
Appellate Case No. 2015-001861

Dear Madam Clerk:

I enclose herewith the original and six (6) copies of Appellants' Motion for an Extension of Time to file Appellant's Initial Brief and Designation of Matter. I am requesting that the Court extend the deadline to file the Initial Brief and Designation of Matter to November 7, 2015. I have consulted with the attorney for Respondents who does not object to my request.

Also, please find enclosed the required filing fee of \$25.00 and the original and two (2) copies of the Proof of Service of the motion on opposing counsel. Please file the originals and necessary copies of both documents and return the clocked copies in the enclosed self-addressed stamped envelope.

Sincerely,



Matthew P. Turner  
MPT/ljf

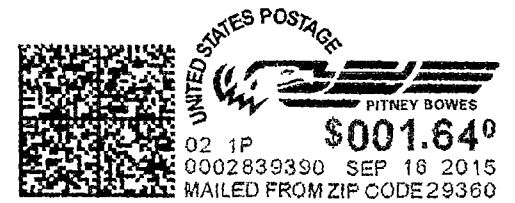
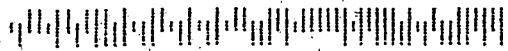
CC: John R. Ferguson, Esquire

Enclosures

**Laurens | Simpsonville**

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