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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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

SEP 03 2015

SC Court of Appeals

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 Nos.: 2013CP2608152, 2013CP2608139,
2014CP2601691, 2014CP2601744

**MOTION FOR EXENSION OF TIME TO FILE INITIAL BRIEF (RULE 208) AND
DESIGNATION OF MATTER ON APPEAL (RULE 209) BY GUARDIAN AD LITEM
AND ATTORNEY FOR ABBIE ILENE DORN**

To All Parties:

Appellant Daniel B. Dorn filed a Notice of Appeal on March 24, 2015, appealing the decision of the Honorable Deadra L. Jefferson filed on February 12, 2015. Appellant Daniel B. Dorn served his brief upon the parties on August 7, 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 8, 2015.

The Guardian *ad Litem* and Attorney for Abbie Ilene Dorn 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* and the Attorney for Abbie Dorn are working together in the preparation of the appeal; however, the Guardian *ad Litem* has had an unusually heavy caseload plus an unexpected death in the family in the past month.

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

By: _____

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September 2, 2015

Surfside Beach, South Carolina

GUARDIAN AD LITEM FOR
ABBIE ILENE DORN

AND

THE HEDGEPATH LAW FIRM

By:



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September 2, 2015

Conway, South Carolina

ATTORNEY FOR ABBIE ILENE DORN