

7-7666

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

RECEIVED
OCT 26 2015
SC Court of Appeals

Appellate Case No.: 2015-0001291
Circuit Case No.: 2014-CP-18-01284

Toni Lynn Tillman,

Respondent

v.

Timothy Troy Tillman and Crystal Tillman,

Defendants

Of whom Timothy Troy Tillman is the Appellant

RESPONDENT'S MOTION FOR EXTENSION OF TIME

The Respondent, by and through her undersigned counsel, moves this Court for an Order permitting her extension of time through and including September 30, 2015 in which to file her Initial Brief in this matter. As grounds for granting this request, the Respondent states:

1. The Respondent's counsel was ill and unable to timely file the Respondent's Initial Brief in this case.
2. The Respondent's counsel delivered the Respondent's Initial Brief to this Court on September 30.

3. The Respondent's counsel consulted with the Appellant's counsel regarding this request. Attached as Exhibit A is a true and correct copy of a "Consent Order" by which the Appellant's counsel expressed his "consent" to the request for this extension of time.
4. The Appellant will not be prejudiced by this brief extension of time. The Appellant's counsel has informed the Respondent's counsel that the Appellant will not be filing a Reply Brief.
5. The Respondent will be prejudiced if she is not permitted this short extension of time to file her Initial Brief. The interests of justice will be served by granting this request.

Wherefore, the Respondent respectfully requests that she be granted an extension of time through and including September 30, 2015 in which to file her Initial Brief in this appeal and that she be granted such other relief as this Court may deem appropriate in these circumstances.

October 23, 2015.

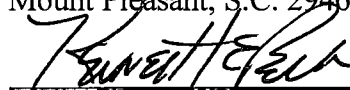


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CERTIFICATE OF SERVICE

The undersigned attorney on behalf of the Respondent, Toni Tillman, hereby, certifies that, on October 23, 2015, a true and correct copy of the foregoing Motion was delivered via electronic transmission and U.S. Mail, first-class postage prepaid to the attorney for the Appellant:

WILLIAM B. JUNG, ESQ.
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Kenneth E. Peck