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THE STATE OF SOUTH CAROLINA **RECEIVED**

In the Court of Appeals

NOV 09 2015

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

James O. Spence, Master-In-Equity Judge

Appellate Case No. 2015-002048

Marjorie E. Temple.....Respondent,

v.

Charles E. Strickland, III, Latisha D. Strickland, and Justin R. Dillon.....Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO  
RESPONDENT'S MOTION TO DISMISS**

Frederick I. Hall, III  
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[rick@sctrilattorneys.com](mailto:rick@sctrilattorneys.com)  
Attorney for Appellant

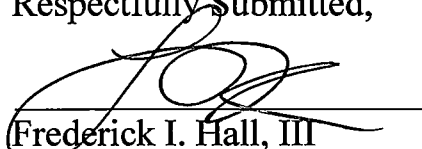
Appellant hereby moves the Court for an Order extending the time period to respond to Respondent's Motion to Dismiss, filed on October 30, 2015, to an additional twenty (20) days.

The principle basis for this motion is the fact that adequate time is needed to respond to Respondent's Motion to Dismiss and counsel for the Appellant has just returned this morning, November 5, 2015, from depositions and case proceedings that have been ongoing since Monday, November 2, 2015 in Chattanooga, Tennessee for a case pending in Georgia. The current response deadline to Respondent's Motion to Dismiss is Monday, November 9<sup>th</sup>, which gives Appellant roughly three days including the weekend to respond to a motion that involves significant legal issues. In fact, it involves issues that apply to the entire South Carolina bar and issues that reach far beyond the parties in this case.

For these reasons, the Appellant respectfully requests that the Court grant his motion for an extension of twenty (20) days from the date of this motion, making the new deadline to respond November 25<sup>th</sup>, 2015 to respond to the Respondent's Motion to Dismiss.

Respectfully Submitted,

BY:

  
Frederick I. Hall, III  
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Attorney for Appellant

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PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to Respond to Respondent's Motion to Dismiss on Marjorie E. Temple by depositing a copy of it in the U.S. Mail, postage prepaid, on November 5, 2015, addressed to her attorneys of record, S. Andrew Syrett and Rolland E. Greenburg, III at the addresses listed below:

**S. Andrew Syrett, Esquire**  
**712 Richland Street, Suite E**  
**PO Box 7403**  
**Columbia, SC 29202**

**Rolland E. Greenburg, III, Esquire**  
**712 Calhoun Street, Suite D**  
**Columbia, S.C. 29201**  
**Attorneys for Respondent**

November 5, 2015

  
\_\_\_\_\_  
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November 5, 2015  
VIA U.S. MAIL

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**Rick Hall**

**Jennifer M. Cooper**

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
1220 Senate Street  
PO Box 11629  
Columbia, South Carolina 29211

**RE: Charles E. Strickland, III, Latisha D. Strickland and Justin Dillon,  
Appellants vs. Marjorie E. Temple, Respondent  
Appellate Case No. 2015-002048**

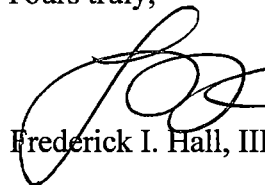
Dear Ms. Kitchings:

Please find enclosed herewith the original and six (6) copies of Appellant's Motion for Extension of Time to Respond to Respondent's Motion to Dismiss, in connection with the above-referenced case.

I am also enclosing a check for \$25.00 to cover the filing fee associated with the filing of this motion.

Should you have questions regarding this matter, please feel free to contact me at my Lexington office.

Yours truly,

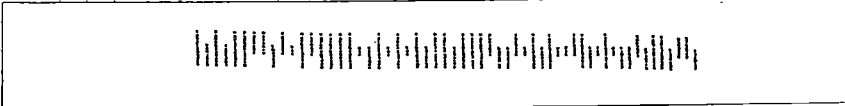
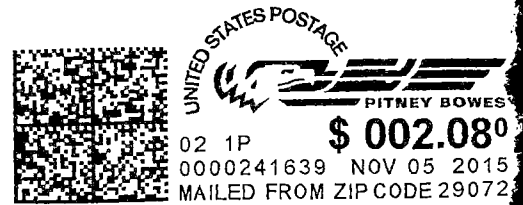


Frederick I. Hall, III

FIH,III/kaj

Enclosures

cc: S. Andrew Syrett, Esquire  
Rolland E. Greenburg, III, Esquire  
Mr. Jimmy Dillon



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