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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Marvin H. Dukes, III

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Appellate Case No. 2015-001813  
Lower Case No. 2014-CP-07-1732

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DEC 07 2015  
SC Court of Appeals

Marilyn W. Bunn, a person non compos mentis by and through her guardian, Denise  
Suddes, and Margaret Bunn Lochmandy ..... Respondents,

v.

Douglas S. Delaney, as Trustee and in his individual capacity, Alan Wilson, the South  
Carolina Attorney General, Sacred Heart-Griffin High School, St. Joseph's Home,  
Quincy University, Notre Dame, The Lawrenceville School, All Saints Catholic Church,  
and Habitat for Humanity c/o All Saints Catholic Church ..... Defendants,

Of Whom Douglas S. Delaney is the ..... Appellant.

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**RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE RESPONDENT'S INITIAL BRIEF**

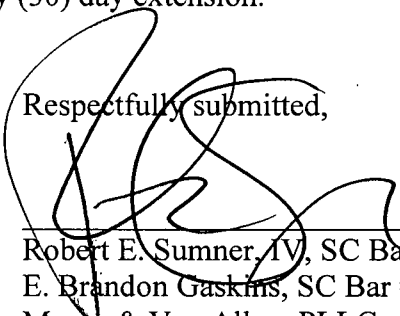
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Pursuant to South Carolina Appellate Court Rule 263(b), Respondents move for  
an extension of thirty (30) days from the existing deadline to file their Initial Brief and  
Designation of Matter to be Included in the Record on Appeal in this matter. Appellant  
filed his Initial Brief Appeal on November 17, 2015. Respondents' Initial Brief and  
Designation of Matter to be Included in the Record on Appeal are now due on or before

December 17, 2015. Respondents request an extension of thirty (30) days to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal because counsel for the Respondents has a federal jury trial beginning on December 14, 2015 and existing work demands and previously scheduled commitments will make it difficult for the parties to analyze and designate the matters to be included in the record, fully research the legal issues involved in this matter, and prepare and file the Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal under the existing deadline.

Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal will be due on or before January 16, 2016 if the extension is granted. Respondents' counsel has conferred with counsel for Appellant's counsel regarding this motion, and Appellant consents to the thirty (30) day extension.

Respectfully submitted,



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E. Brandon Gaskins, SC Bar #73274  
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*Attorney for Respondents*

December 4, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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The Honorable Marvin H. Dukes, III

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Of Whom Douglas S. Delaney is the ..... Appellant.

**PROOF OF SERVICE OF MOTION FOR EXTENSION**

This is to certify that I have this day served counsel for the Respondent in the foregoing matter with a copy of the foregoing *Motion for Extension of Time to File Respondents' Initial Brief* by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Sean Michael Bolchoz, Esquire  
Bolchoz Law Firm, PA  
6 Buckingham Plantation Drive, Suite B  
Post Office Box 828  
Bluffton, South Carolina 29910  
(843) 836-3033



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*Attorney for Respondents*

December 4, 2015, 2015  
Charleston, South Carolina

**Moore & Van Allen**

December 4, 2015

Robert E. Sumner, IV  
Attorney at Law

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

Moore & Van Allen PLLC

78 Wentworth St.  
Charleston, SC 29401-1428

Mailing Address:  
Post Office Box 22828  
Charleston, SC 29413-2828

**RE: Marilyn W. Bunn, et al., v. Douglas S. Delaney, et al.**  
**Appellate Case No. 2015-001813**  
**MVA File No. 038025.1**

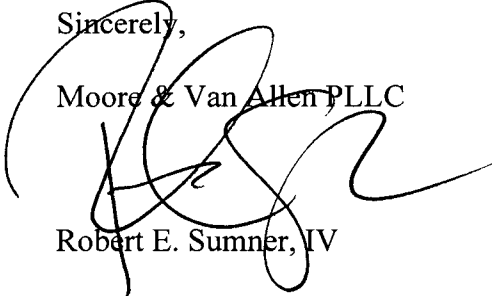
Dear Ms. Kitchings:

With regard to the above-referenced matter, enclosed please find and original and seven copies of the Appellant's Motion to Extend Time to File Respondent's Initial Brief and Proof of Service, along with a check in the amount of \$25.00 as the required filing fee. Please file the originals and return a filed stamped copy to our office in the enclosed self-addressed stamped envelope. By copy of this letter, I am serving Appellant with a copy of the same.

Thank you for your assistance in this matter and please call me with any questions.

Sincerely,

Moore & Van Allen PLLC

  
Robert E. Sumner, IV

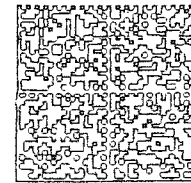
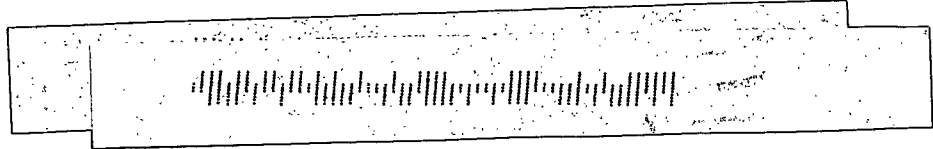
Enclosures: as stated

cc: Sean Michael Bolchoz, Esquire

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SC Court of Appeals



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**Moore & Van Allen**

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