

7/17/88

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

RECEIVED

Eugene C. Griffith, Jr., Circuit Court Judge

NOV 16 2015

SC Court of Appeals

Case No. 2013-CP-30-3513

Kathleen Lollis and Linda CampbellAppellants/Respondents,

vs.

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

**MOTION FOR EXTENSION OF TIME
TO FILE APPELLANTS/RESPONDENTS
INITIAL BRIEF AND RESPONSE TO
RESPONDENTS/ APPELLANTS
INITIAL BRIEF**

Kathleen Lollis and Linda Campbell, Appellants/Respondents, hereby move, pursuant to Rule 240 of the South Carolina Appellate Court Rules, for an extension of time in which to file Appellants/Respondents Initial Brief in response to the Initial Brief of Respondents/Appellants. Counsel for Appellants/Respondents received Respondents/Appellants Initial Brief and Designation of Matter on November 9, 2015. Accordingly, Appellants/Respondents Initial Brief is due on December 8, 2015. Appellants/Respondents basis 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 raised in Respondents/Appellants Initial Brief;
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 raised in Respondents/Appellants Initial Brief;

3. The undersigned will be out of the office on vacation from November 11, 2015 through November 18, 2015 for a trip that has been scheduled since February 2015;
4. The undersigned will be off for several days toward the end of November for the Thanksgiving holiday and will also be out of the office for two days to attend the South Carolina Association for Justice "Auto Torts Seminar" the first week in December.
5. 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/Respondents respectfully request that this Court extend the deadline of filing and serving Appellants/Respondents Initial Brief in response to Respondents/Appellants Initial Brief until January 8, 2016. Appellants/Respondents further request that the current deadline be stayed during the pendency of this motion.

November 16, 2015

TURNER & BURNEY, P.C.



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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PROOF OF DELIVERY

I certify that I have served a copy of the Motion for Extension of Time to File Appellants/Respondents' 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 November 12, 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

Matthew P. Turner
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(864) 984-6565
Attorney for Appellants/Respondents

November 12, 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

November 13, 2015

RECEIVED

NOV 16 2015

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/Respondents' 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 January 8, 2016. I have consulted with the attorney for Respondents/Appellants 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

Matthew P. Turner
MPT/ljf

CC: John R. Ferguson, Esquire

Enclosures

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