

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SEP 17 2012
SC Court of Appeals

APPEAL FROM CLARENDON COUNTY
COURT OF COMMON PLEAS

W. Jeffrey Young, Circuit Court Judge
And
George C. James, Circuit Court Judge

Case No. 2008 CP 14-0461

Andreal Holland by his Guardian Ad Litem,
Peggy Knox,
Plaintiff/Appellant,

vs.

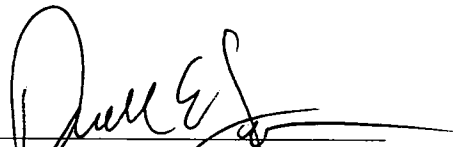
Morbark, Inc, Precision Husky Corporation,
A & K Mulch, LLC, Watford Industry, Inc.,
Defendants, of whom Morbark, Inc. is the Respondent,

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL REPLY BRIEF
AND RECORD ON APPEAL UNTIL OCTOBER 15, 2012

The Appellant respectfully requests an extension of time to file the Initial Reply Brief and Record on Appeal until Monday, October 15, 2012. The grounds for this motion are that I have had to temporarily leave my practice and request protection in all pending cases following my son's catastrophic injury followed by an ischemic stroke and paralysis. My wife and I are providing full time care for my son during this critical period following a recurrence of the stroke related brain swelling and craniotomy procedure. I anticipate that my son will soon undergo a procedure to replace the skull section that was removed and that I can trust some of his care to others while I attend to completing the appeal in this case. Further grounds for this brief extension of time until October 15, 2012, are that the appeal involves a number of complex

issues and the record on appeal is extensive.

Sept. 14, 2012



Donald E. Jonas, Esquire
PO Box 99 (29071)
142 A.B. Frye Rd.
Lexington, SC 29073
Attorney For Appellant
803-609-1484/309-2483

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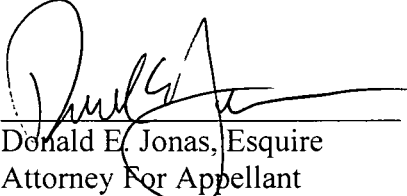
Plaintiff/Appellant,

vs.

Morbark, Inc, Precision Husky
Corporation, A & K Mulch, LLC,
Watford Industry, Inc., Defendants,
of whom Morbark, Inc. is the Respondent,

PROOF OF SERVICE

I certify that I have served one copy of the Appellant's Motion To Extend Time To File Appellant's Initial Reply Brief and Record On Appeal on the Respondents' Attorney as shown below, by delivery of said documents to the attorney for the Respondent at the address listed below on September 14, 2012; all in accordance with the *South Carolina Rules of Civil Procedure*. 16


Donald E. Jonas, Esquire
Attorney For Appellant

Curtis L. Ott, Esquire
Gallivan, White & Boyd, P.A.
1201 Main St, Suite 1200
Columbia, SC 29201
Attorney For Respondent Morbark, Inc.

DONALD E. JONAS
ATTORNEY AND COUNSELLOR AT LAW
PO Box 99 (29071)
142 A.B. Frye Rd.
Lexington, S.C. 29073

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SC Court of Appeals

Reply To:
Phone: (803) 609-1484/309-2483
Fax: (803) 957-3119
jonastralatty@netscape.net

Sept. 14, 2012

Honorable Tanya Gee
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Andreal Holland by his Guardian Ad Litem, Peggy Knox, Plaintiff/Appellant vs. Morbark, Inc., Defendant/Respondent, 2008 CP 14-00461
S.C. Case Tracking #: 20111999928

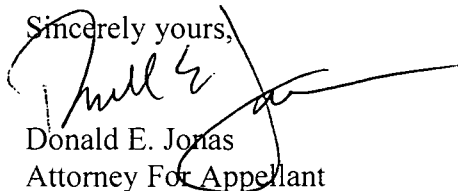
Dear Ms. Gee:

Please find enclosed for filing:

- (1) The original and seven copies of Plaintiff/Appellant's Motion To Extend Time for Filing the Appellant's Initial Reply Brief and Record on Appeal until October 15, 2012;
- (2) One copy of an Affidavit of Service;
- (3) Check for filing fee.

Please clock the extra copy of the motion and return in the envelope provided. Thanking you for your assistance in this matter, I am

Sincerely yours,



Donald E. Jonas
Attorney For Appellant

DEJ/sl
Enclosures
cc:
Curtis L. Ott, Esquire
Gallivan, White & Boyd, P.A.
1201 Main St, Suite 1200
PO Box 7368 (29202)
Columbia, SC 29201
Attorney For Respondent Morbark, Inc.