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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

JAN 25 2016

**SC Court of Appeals**

Robin B. Stilwell, Circuit Court Judge

Case No. 2006-CP-39-1826

J. Scott Kunst,

Respondent,

v.

David Loree,

Appellant.

**MOTION FOR EXTENSION OF TIME**

J. Scott Kunst *pro se*  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961  
*Repondent*

V. Elizabeth Wright (SC Bar ID 76029)  
V. Elizabeth Wright Law Firm, LLC  
217 E. Park Avenue  
Greenville, SC 29601  
(864) 326-5281  
bethwrightattorney@gmail.com

Gregory K. Smith (admitted *pro hac vice*)  
King & Spaulding, LLP  
1180 Peachtree Street  
Atlanta, GA 30309  
(404) 572-2858  
GKSmith@kslaw.com

*Attorneys for the Appellant*

Pursuant to Rules 208, 209 and 240, SCACR, Respondent J. Scott Kunst respectfully moves for an extension of time to file his Initial Brief and Designation of Matter. A family medical emergency necessitated that the Respondent *pro se* travel out-of-state for two weeks. Further details may be provided upon request.

The Respondent requests a 10-day extension of time, which would extend the deadline to January 29, 2016.

Respectfully submitted.



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J. Scott Kunst, Respondent, *Pro se*  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961

Simpsonville, South Carolina  
January 19, 2016

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2006-CP-39-1826


J. Scott Kunst, Appellant,

v.

David Loree, Respondent.

**PROOF OF SERVICE**

I, J. Scott Kunst, Respondent *pro se*, hereby certify that I have served the Respondent's Motion For Extension of Time on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on January 19, 2016, addressed to the Appellant's counsel of record as follows: V. Elizabeth Wright, V. Elizabeth Wright, P.A., 217 E. Park Avenue, Greenville, SC 29601, and Gregory K. Smith, King & Spaulding, LLP, 1180 Peachtree Street, Atlanta, GA 30309.

  
\_\_\_\_\_  
J. Scott Kunst, Respondent, *Pro se*  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961

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January 19, 2016

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *J. Scott Kunst v. David Loree*,  
C.A No.: 2006-CP-39-1826

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**SC Court of Appeals**

Dear Ms. Kitchings:

Please find enclosed for filing the original and six copies of the Respondent's Motion for Extension of Time and Proof of Service. A check for the \$25 filing fee is also enclosed.

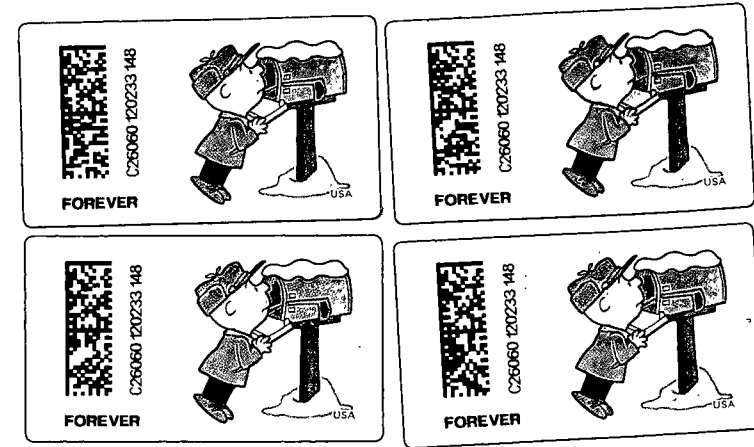
Please feel free to contact me if you have any questions.

Sincerely,

  
\_\_\_\_\_  
J. Scott Kunst  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961  
*Respondent pro se*

cc: V. Wright, Esq.  
Gregory K. Smith, Esq.

KUNST  
130 ARABIAN WAY  
Simpsonville, SC 29681



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SC Court of Appeals

Hon. Jenny Abbott Kitchens  
Clerk, SC Court of Appeals  
PO BOX 11629  
Columbia, SC 29211

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