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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Marvin H. Dukes, III

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FEB 01 2016

SC Court of Appeals

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

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.

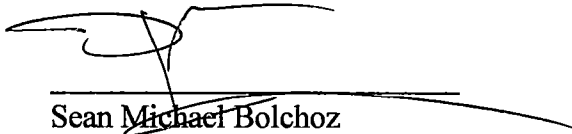
**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S INITIAL REPLY BRIEF**

Pursuant to South Carolina Appellate Court Rule 263(b), Appellant hereby moves for an extension of thirty (30) days from the existing deadline to file his Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal in this matter. Respondents filed their Initial Brief on January 19, 2016, though Appellant's counsel only received it via email on January 20 (and the hard copy via regular mail on January 26). Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal is now due on or before January 29, 2016.

Appellant requests an extension of thirty (30) days to file the Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal on the following grounds: at the time he received the Respondent's Brief, Appellant's counsel was preparing for a trial, which was held on January 25, 2016, and Appellant's counsel believes he will be unable to prepare a proper reply without additional time beyond the current deadline.

Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record of Appeal will be due on or before February 28, 2016 if the extension is granted.

Respectfully submitted,



Sean Michael Bolchoz
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Post Office Box 828
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(843) 836-3033
Attorney for Appellant

January 27, 2016

H:\D to G Clients\Delaney - 2716\John & Marilyn W. Bunn CRT - 11\Appeal\motion - extension of time - file initial reply brief.wpd

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PROOF OF SERVICE

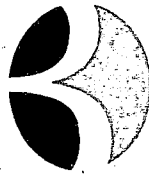
I certify that I have served the Appellant's Motion for Extension of Time to File Appellant's Initial Reply Brief upon the Respondents by depositing a copy of same in the United States Mail, postage prepaid, on January 27, 2016, addressed to Respondents' attorney of record, Robert E. Sumner, IV, Esquire.



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Attorney for Appellant

January 27, 2016

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SC Court of Appeals

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

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

Dear Ms. Kitchings:

Please find enclosed the originals and one copy each of Appellant's Motion for Extension of Time to File Appellant's Initial Reply Brief and Proof of Service for the above-captioned case, along with this firm's check in the amount of \$25.00 for the filing fee. Please file the originals and return the clocked-copies to me via the enclosed self-addressed, stamped envelope.

By copy of this letter, we are serving Respondents with a copy of the same.

With kind, personal regards, I am

Sincerely,

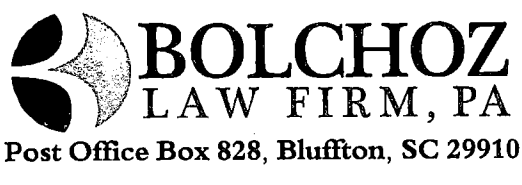
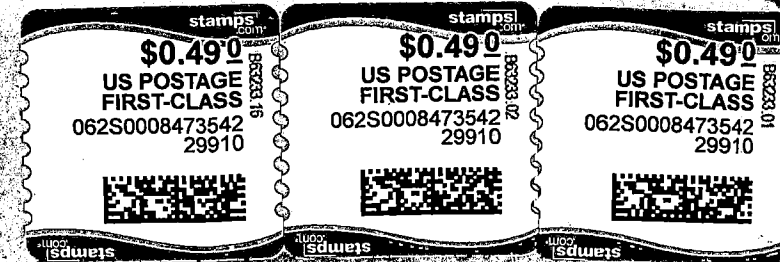
BOLCHOZ LAW FIRM, PA

Laura F. Obi
SENDER'S E-MAIL ADDRESS:
ADMIN@BOLCHOZLAW.COM

/lfo
Enclosures

cc: Robert E. Sumner, IV, Esquire (w/encl.)
Douglas S. Delaney, Esquire (via email only to doug@delaneylawfirm.com)

H:\D to G Clients\Delaney - 2716\John & Marilyn W. Bunn CRT - 11\Appeal\Correspondence - Misc\Kitchings ltr - motion - extension of time.wpd



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