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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

**RECEIVED**

FEB 05 2016  
SC Court of Appeals

J. Scott Kunst .....Respondent,

v.

David Loree .....Appellant.

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

V. Elizabeth Wright (SC Bar ID 76029)  
V. ELIZABETH WRIGHT LAW FIRM, LLC  
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*Attorneys for the Appellants*

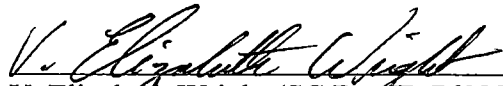
Other counsel of record:

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

Respondent

Pursuant to Rules 208 and 240, SCACR, counsel for Appellant David Loree respectfully requests an extension of time until February 24, 2016 in which to file and serve the Reply to Respondent's Initial Brief. Counsel makes this request for two reasons. One, Respondent's Initial Brief, served on January 28, 2015, did not arrive in the mail at Appellant's counsel's office until February 2, 2016, leaving counsel with only four days to reply as set out in Rule 208, SCACR. Two, both Ms. Wright and Mr. Smith have a heavy caseload this month and will require more time in order to prepare the Reply brief. Counsel greatly appreciates any leeway that this Court can grant.

Respectfully submitted.



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*Attorneys for the Appellants*

Greenville, South Carolina

February 3, 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

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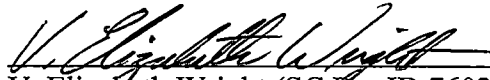
David Loree .....Appellant,

v.

J. Scott Kunst .....Respondent.

**PROOF OF SERVICE**

I certify that I have served the **Motion for Extension of Time to Reply to Respondent's Initial Brief** on *pro se* Respondent at his last-known address of 130 Arabian Way, Simpsonville, SC 29681, by depositing it into the U.S. Mail, first class postage prepaid on February 3, 2016.

  
V. Elizabeth Wright (SC Bar ID 76029)  
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February 3, 2016

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: J. Scott Kunst v. David Loree**  
**Civil Action Number 2006-CP-39-1826**

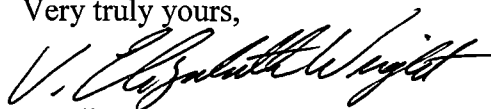
Dear Ms. Kitchings:

Please find enclosed for filing the original and <sup>seven</sup>one copy of the following items:

1. Motion for Extension of Time to Reply to Respondent's Initial Brief;
2. A check for the filing fee of \$25.00; and
3. Proof of Service.

The clocked-in copy of the Motion may be returned to me in the enclosed, self-addressed, stamped envelope.

Very truly yours,



V. Elizabeth Wright

BW  
Enclosures

cc. J. Scott Kunst, *pro se*  
Gregory K. Smith, Esq. (email only)

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