

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

78688

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2013-CP-30-3513

RECEIVED  
FEB 12 2016  
SC Court of Appeals

Kathleen Lollis and Linda Campbell .....Appellants/Respondents,

vs.

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

**MOTION FOR EXTENSION OF TIME  
TO FILE RECORD ON APPEAL**

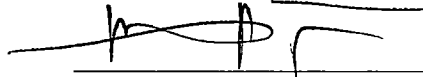
Kathleen Lollis and Linda Campbell, Appellants/Respondents, hereby move, pursuant to Rule 240 of the South Carolina Appellate Court Rules, for an extension of time in which to file the Record on Appeal. Currently, the Record on Appeal is due February 19, 2016. Appellants/Respondents base their motion on the following grounds:

1. The undersigned was not trial counsel in this matter and needs additional time to gather copies of all necessary documents from the Court's file; and
2. The Record on Appeal will likely exceed 1000 pages and will take a substantial amount of time to copy and prepare;

For these reasons, Appellants/Respondents respectfully request a 30 day extension of time in which to file and serve the Record on Appeal. Appellants further request that the current deadline be stayed during the pendency of this motion.

February 10, 2016

TURNER & BURNEY, P.C.



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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 the Record on Appeal on Lisa Dutton, Dennis Dutton, and Kelsey Dutton, by depositing a copy of the same in the United States Mail, with postage prepaid, on February 10, 2016, 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  
S.C. Bar No.: 71719  
105 West Public Square  
Post Office Box 668  
Laurens, South Carolina 29360  
(864) 984-6565  
Attorney for Appellants/Respondents

February 10, 2016

**TURNER &  
BURNEY, PC**  
Attorneys at Law

J. Michael Turner, Sr.  
Rhett D. Burney  
Matthew P. Turner

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Reply to:

PO Box 668  
Laurens, SC 29360

February 10, 2016

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**SC Court of Appeals**

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

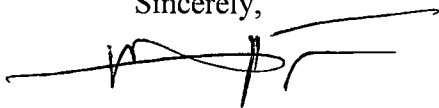
RE: Kathleen Lollis and Linda Campbell vs. Lisa Dutton, Dennis Dutton, and Kelsey Dutton  
Appellate Case No. 2015-001861

Dear Madam Clerk:

I enclose herewith the original and six (6) copies of Appellants' Motion for an Extension of Time to file the Record on Appeal. I am requesting that the Court grant an extension of thirty (30) days to file the Record on Appeal.

Also, please find enclosed the required filing fee of \$25.00 and the original and two (2) copies of 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,



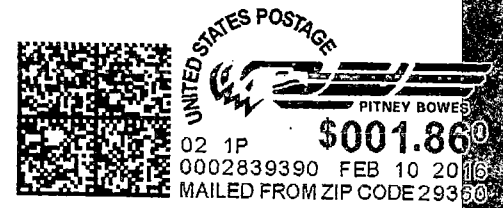
Matthew P. Turner  
MPT/ljf

CC: John R. Ferguson, Esquire

Enclosures

**Laurens | Simpsonville**

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628 NE Main Street, Simpsonville, South Carolina 29681 • 864-228-1616 Phone • 864-228-6722 Fax  
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PO Box 668  
Laurens, SC 29360

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**Jenny Abbott Kitchings**  
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