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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HAMPTON COUNTY  
Court of Common Pleas  
The Honorable Perry M. Buckner, III

RECEIVED  
APR 15 2016  
SC Court of Appeals

Case No. 2015-001947

Alice Hazel, as GAL for Jacob N., ..... Respondent,

v.

Blitz U.S.A., Inc., Fred's, Inc., Tiger Express Varnville LLC, and James Nix,...Defendants.

Of Whom Fred's, Inc. is the ..... Appellant.

And

Melinda Cook, ..... Respondent,

v.

Blitz U.S.A., Inc., Fred's Inc., Tiger Express Varnville LLC, and James Nix,...Defendants.

Of Whom Fred's, Inc. is the ..... Appellant.

RESPONDENTS' SECOND MOTION FOR AN EXTENSION

Respondents Alice Hazel, as GAL for Jacob N., and Melinda Cook for a thirty-day extension in which to file the Initial Brief of Respondents and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Respondents is currently due on April 14, 2016. This is Respondents' second request for an extension. The extension is needed because Kathleen C. Barnes, esquire, suffered a severe injury to her right thumb on

April 9, 2016, and is currently unable to use her right hand to type. Respondents respectfully request an extension of twenty days.

Respectfully submitted,

*Kathleen C. Barnes*

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Kathleen Chewning Barnes  
SC Bar No. 78854  
BARNES LAW FIRM, LLC  
[kbarnes@barneslawfirm.com](mailto:kbarnes@barneslawfirm.com)  
Post Office Box 897  
Hampton, SC 29924  
(803) 943-4529

*Attorneys for Respondents*

Mark D. Ball  
SC Bar No. 12894  
Peters, Murdaugh, Parker, Eltzroth &  
Detrick, P.A.  
[mball@pmped.com](mailto:mball@pmped.com)  
P.O. Box 457  
Hampton, SC 29924  
803-943-2111

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing *Respondents' Second Motion for an Extension* has been served upon the following counsel of record by mailing one copy by United States Mail, addressed as shown below this 13 day of April, 2016.

Matthew C. LaFave  
CROWE LAFAVE, LLC  
Post Office Box 1149  
Columbia, SC 29202

April 13, 2016

Kathleen C. Barnes

Kathleen Chewning Barnes, SC Bar No. 78854

Barnes Law Firm, LLC

P.O. Box 897

803-943-4529

Hampton, SC 29924

[kbarnes@barneslawfirm.com](mailto:kbarnes@barneslawfirm.com)

# BARNES

LAW FIRM | LLC

Kathleen C. Barnes  
Admitted: Georgia | South Carolina

April 13, 2016

**Via U.S. Mail**

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

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APR 15 2016

SC Court of Appeals

Re: *Melinda Cook and Alice Hazel, as GAL for Jacob N. v. Blitz  
U.S.A., Inc., et al.*  
Consolidated Appellate Case No. 2015-0001947

Dear Ms. Kitchings:


Enclosed for filing please find the original and seven copies of Respondents' Motion for an Extension in the above-referenced consolidated case. Also enclosed is proof of service of the Motion, and a check in the amount of \$25.00 for the Motion filing fee.

Please file the documents and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,

BARNES LAW FIRM, LLC



Kathleen C. Barnes

Enclosures

cc: Matthew C. LaFave  
Mark D. Ball (via e-mail)

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

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