

79172

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2013-CP-40-7214
Appellate Case No. 2015-001638

RECEIVED

APR 06 2016

SC Court of Appeals

Patricia B. Cathey.....Respondent,

v.

Alma Patterson Creighton and William Kinzley Appellant,
Of whom Alma Patterson Creighton is the Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENTS' INITIAL REPLY BRIEF
AND DESIGNATION OF MATTER**

The undersigned counsel for the Respondent Patricia B. Cathey respectfully requests an extension of time to file and serve the Respondent's Initial Reply Brief and Designation of Matter in the above-captioned appeal. The current deadline for Respondent's Initial Reply Brief and Designation of Matter is April 8, 2016. Respondent respectfully requests an extension of thirty (30) days with a new due date of May 8, 2016.

This motion is based on the following grounds:

1. Respondent received the transcript of the motion for summary judgment hearing on March 9, 2016, thus the current deadline for the Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal is April 8, 2016.

2. The undersigned counsel for the Respondent and counsel for the Appellant need additional time to consult and negotiate further settlement options.

3. The undersigned counsel needs the requested additional time to adequately prepare and have the client review the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal and, in the interests of justice, respectfully requests that this Honorable Court grant this extension of time.

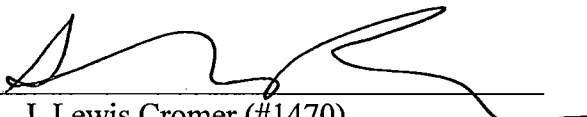
4. The Appellant's counsel has been consulted and has kindly consented to the requested extension.

WHEREFORE, the Respondent's counsel respectfully requests that she be allowed additional time, through and including May 8, 2016, in which to file and serve Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

(Signature block on the following page)

Respectfully submitted by,

J. LEWIS CROMER & ASSOCIATES, L.L.C.

BY: 

J. Lewis Cromer (#1470)
Shannon M. Polvi (#101837)
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Fax 803-799-9533

AND

David A. Fedor (#1974)
1241 Main Street
Post Office Box 1176
Columbia, South Carolina 29201
Phone 803-799-2088

Attorneys for Respondent

Other Counsel of Record:

Joshua D. Shaw, Esquire
Turner, Padgett, Graham & Lainey, PA
1901 Main Street, 17th Floor
Columbia, SC 29211

Counsel for Appellant

April 6, 2016
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2013-CP-40-7214
Appellate Case No. 2015-001638

RECEIVED
APR 06 2016
SC Court of Appeals

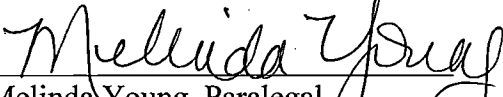
Patricia B. Cathey.....Respondent,

v.

Alma Patterson Creighton and William KinzleyAppellant,
Of whom Alma Patterson Creighton is the Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter and Notice of Appearance on Appellant's counsel by depositing a copy of it in the United States Mail, postage prepaid, on April 6, 2016, addressed to the attorneys of record, Joshua D. Shaw, Esquire of Turner, Padgett, Graham & Lainey, PA located at 1901 Main Street, 17th Floor, Columbia, SC 29211.


Melinda Young, Paralegal
J. LEWIS CROMER & ASSOCIATES, L.L.C.
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530

**J. LEWIS CROMER
& ASSOCIATES L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

JULIUS W. BABB, IV
RYAN K. HICKS

J. LEWIS CROMER
J. PAUL PORTER
SHANNON M. POLVI

ASHLEY C. STORVICK
CHELSEA R. RUMBLE

RECEIVED

APR 06 2016

SC Court of Appeals

April 6, 2016

Via Hand Delivery

Hon. Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Patricia B. Cathey & Alma Patterson Creighton & William Kinzley*
Appellate Case No. 2015-001638

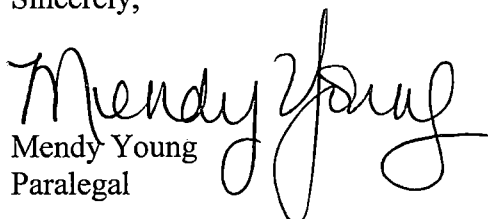
Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent's Motion for Extension of Time to File Respondents' Initial Brief & Designation of Matter and Notice of Appearance in connection with the above referenced matter. Also enclosed please find our firm's check in the amount of \$25.00, representing the motion filing fee for same.

By copy of this letter to counsel of record, we are serving a copy of same to them.

With kind regards, I remain

Sincerely,


Mendy Young
Paralegal

/mmy
Enclosures

cc: Joshua D. Shaw, Esquire
Patrick D. Quinn, Esquire
David Fedor, Esquire