

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Stephanie P. McDonald, Circuit Court Judge

C/A No.: 08-CP-16-0707

Issac Johnson,

Respondent,

v.

E.ve Williams, Davis McFarland,
Charles Douglas, Bernice Wilson,
Wilken Benjamin, Eddie Gwaltney,
Robert Ervin, Kelvin Byrd, Ronald
Mumford, Layton Swinney, Carl
Days, Alton Taylor, Daisey Weaver,
Melvin Warren, Larry Stivers, and
Jerusalem Baptist Church,

of whom

Kelvin Byrd is the

Appellant.

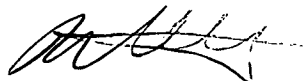
MOTION FOR EXTENSION OF TIME

The Appellant, Kelvin Byrd, by and through undersigned counsel, hereby requests and extension of time of thirty days in which to file Appellant's initial brief and designation of matter to be included in the record on appeal. In support of such motion, Appellant's counsel avers that this is Appellant's second request for and extension, and first motion for an extension. Due to the relocation of Appellant's counsel's office to 515 East Main Street in Lexington, renovations thereat (which have just this week been completed), the hiring and training of a new legal assistant, certain medical issues (oral surgery), and numerous other deadlines, Appellant's counsel has been delayed in completing the initial brief. Wherefore, Appellant respectfully moves this honorable court for an extension of thirty days. Appellant's counsel received the consent of opposing counsel, as indicated by the attached e-mail correspondence.

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MAY 09 2012
SC Court of Appeals

2nd
5/9/12
6/8/12

05/09/12



Kevin H. Sitnik
The South Carolina Law Firm
515 East Main Street
Lexington, South Carolina 29072

Mailing Address:
Post Office Box 389
Irmo, South Carolina 29063
(803) 520-6573
kevin@thesouthcarolinalegalfirm.com

On Behalf of Appellant

From: John Clark <jclark@theclarklawfirm.com>
Subject: Re: Johnson v Jerusalem Bapt
Date: May 9, 2012 12:47:44 PM EDT
To: Kevin Sitnik SCLF <kevin@thesouthcarolinainlawfirm.com>

Kevin:

I completely understand your situation and will consent to the requested extension as a professional courtesy. I am out of the office right now but will be back about 3 if you need me to sign anything or you may sign my name if you feel comfortable doing so and it makes things easier. Good luck.

John

Sent from my iPhone

On May 9, 2012, at 12:05 PM, Kevin Sitnik SCLF <kevin@thesouthcarolinainlawfirm.com> wrote:

Mr Clark

I respectfully ask your consent on an extension to file the initial brief and designation on behalf of kelvin Byrd due to the relocation of and renovation of my new office, the hiring and training of a new legal assistant, and my own oral surgery. I have to file the motion today. If you would, please respond to this email.

Sincerely,

Kevin Hayne Sitnik
The South Carolina Law Firm, P.C.
515 East Main Street
Lexington, South Carolina 29072
Office:(803) 520-6573
Mobile:(803) 767-1343
kevin@thesouthcarolinainlawfirm.com

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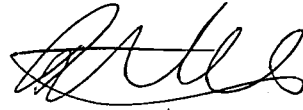
Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time on the above named Respondents by depositing a copy of it in the United States Mail, postage prepaid, on May 9, 2012, addressed to his attorney of record listed below:

<p>Mr. John Derrick Clark Clark Law Firm, LLC PO Drawer 880 Sumter, SC 29151 Attorneys for Respondent</p>

05/09/12



Kevin H. Sitnik
The South Carolina Law Firm
515 East Main Street
Lexington, South Carolina 29072

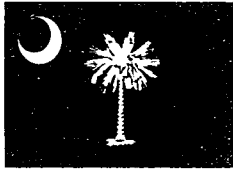
Mailing Address:
Post Office Box 389
Irmo, South Carolina 29063
(803) 520-6573
kevin@thesouthcarolinalegalfirm.com

On Behalf of Appellant

RN. 64163

THE SOUTH CAROLINA LAW FIRM, P.C.

KEVIN HAYNE SITNIK, ESQUIRE
515 East Main Street
Lexington, South Carolina 29072



Mailing Address

Post Office Box 389
Irmo, South Carolina 29063
Office: (803) 520-6573

Wednesday, May 9, 2012

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Via U.S. Mail

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

RE: Johnson v. Jerusalem Baptist Church, et al.

Tracking No.:2011200206

Dear Ms Kitchings:

Please find enclosed an original and six copies of a Motion for Extension of Time for filing of Appellant's Initial brief and Designation of Matter to be Included in Record on Appeal in the above-captioned action, along with Proof of Service of the same, and a check for twenty-five dollars.

Should you have any questions, please contact my office.

Sincerely,

Kevin Hayne Sitnik

cc: John D. Clark, Esquire (via U.S. Mail)