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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

JUN 09 2016

SC Court of Appeals

The Honorable Carmen T. Mullen, Fourteenth Judicial Circuit Court Judge
Case No.: 2015-CP-07-239

Appellate Case No.: 2016-000803

E. PERRY BURRUS, M.D. Appellant

-vs-

JENNIFER R. BERGMANN Respondent

APPELLANT'S MOTION FOR EXTENSION TO FILE INITIAL BRIEF

Appellant received the transcript of hearing on May 9, 2016, making Appellant's Initial Brief due on June 8, 2016. On June 1, 2016 the undersigned wrote the Court of Appeals advising that Respondent, Jennifer R. Bergmann, filed for bankruptcy (Ch. 7) on May 6, 2016, Case No. 16-02250-dd. It is the undersigned's understanding that under 11 U.S. Code § 362 of the Bankruptcy Code, the filing of bankruptcy stays the continuation of any judicial proceeding against Ms. Bergmann, the bankruptcy debtor and Respondent in this Appeal. It is Appellant's understanding that the Court of Appeals is reviewing this matter to determine if the bankruptcy stay applies, and Appellant, therefore, respectfully requests a sixty (60) day extension to file and serve Appellant's Initial Brief. This extension would make the Appellant's initial brief due on or before August 8, 2016, assuming that the case is not stayed for bankruptcy. This is Appellant's first request for

an extension. Upon information and belief, Respondent is *pro se* and Counsel for Appellant did not obtain consent to this motion from Respondent.

Respectfully submitted,

TWENGE + TWOMBLY LAW FIRM

BY:


J. ASHLEY TWOMBLY
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Attorneys for Appellant

Beaufort, South Carolina

June 7, 2016

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APPEAL FROM BEAUFORT COUNTY
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The Honorable Carmen T. Mullen, Fourteenth Judicial Circuit Court Judge
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E. PERRY BURRUS, M.D. Appellant


-vs-

JENNIFER R. BERGMANN Respondent

CERTIFICATE OF SERVICE

The undersigned, Andrea Smith, hereby avers that she is a Paralegal with TWENGE + TWOMBLEY LAW FIRM, Attorneys for Appellant, and that on the 7th day of June 2016 a true and accurate copy of the attached Appellant's Motion for Extension to File Initial Brief was placed in an envelope with first class postage thereon prepaid through the United States Postal Service and mailed to the following:

Ms. Jennifer R. Bergmann
4 Oakland Place
Berkeley Hall
Bluffton, SC 29910

BY: 
Andrea Smith, Paralegal to
TWENGE + TWOMBLEY LAW FIRM

TWENGE + TWOMBLEY LAW FIRM LLC

311 CARTERET STREET
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J. ASHLEY TWOMBLEY
KARL D. TWENGE
JENNIFER I. CAMPBELL
LICENSED IN SC + GA
OF COUNSEL

June 7, 2016

Via Facsimile and U.S. Mail

The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
(803) 734-1839

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JUN 09 2016

SC Court of Appeals

RE: E. Perry Burrus v. Jennifer R. Bergmann
Appellate Case No.: 2016-000802

Dear Ms. Kitchings:

I am writing to advise that the transcript regarding the referenced matter was received on May 9, 2016, making Appellant's Initial Brief due June 9, 2016. In addition, please find enclosed an unbound original and seven (7) copies of Appellant's Motion for Extension and Certificate of Service regarding the referenced matter. I would appreciate it if you would file the original and six copies and return a clocked copy of each to me in the enclosed self-addressed, stamped envelope. Enclosed is my firm's check in the amount of \$25.00, which represents the filing fee.

By copy of this letter, I am serving the same upon Respondent.

Thank you for your consideration in this matter. If you have any questions, please do not hesitate to contact me.

With kindest regards, I remain

Cordially,


J. Ashley Twombley

cc: Ms. Jennifer R. Bergmann

Twenge and Twombly Law Firm
311 Carteret Street
Beaufort, SC 29902

The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals
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