

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 27 2016

SC Court of Appeals

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Court Judge  
2013-002319

In the Matter of the Estate of Marion M. Kay


Edward D. Sullivan, as Personal Representative  
of the Estate of Marion M. Kay, . . . . . Appellant/  
Cross-Respondent

v.

Martha Brown and Mary Moses, . . . . . Respondents/  
Cross-Appellants

MOTION TO EXTEND DEADLINE  
FOR FILING PETITION FOR REHEARING

The undersigned counsel for the Respondents/Appellants hereby moves the Court to grant him a thirty (30) day extension to file a Petition for Rehearing. Opposing counsel has stated that he is not opposed to the granting of this relief.

  
John R. Ferguson  
S.C. Bar No. 1987  
214 W. Laurens St. - PO Box 286  
Laurens, SC 29360  
(864) 984-2126

June 21, 2016

COX FERGUSON & WHAM, LLC  
Attorneys for Respondents/Appellants

**COX, FERGUSON & WHAM**

ATTORNEYS AT LAW  
107 E. Laurens St.  
P.O. Box 286  
LAURENS, SOUTH CAROLINA 29360-0286

W. REID COX, JR.  
JOHN R. FERGUSON  
ALLEN M. WHAM

PHONE: (864) 984-2126  
FAX: (864) 984-7372  
E-MAIL: jferg@backroads.net

June 23, 2016

**RECEIVED**

JUN 27 2016

**SC Court of Appeals**

Office of the Clerk of Court  
S.C. Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

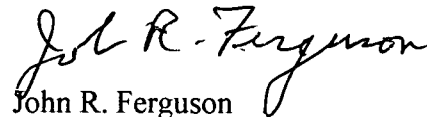
ATTN.: AMELIA

Re: Sullivan v. Moses, et al., 2013-002319

Dear Amelia:

Enclosed with this letter you will find an original and ten copies of a corrected Motion to Extend Deadline for Filing Petition for Rehearing plus an original and copy of a Certificate of Service for the Petition. Please file the originals and send me a clocked copy of each document in the enclosed envelope. You already have a check for the filing fee. As always, thank you for your help.

Sincerely,

  
John R. Ferguson

JRF/wp  
Encl.  
CC: Daryl G. Hawkins, Esq.

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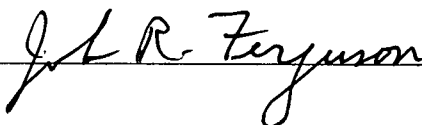
Edward D. Sullivan, as Personal Representative  
of the Estate of Marion M. Kay, . . . . . Appellant/  
Respondent

v.

Martha Brown and Mary Moses, . . . . . Respondent/  
Appellant

CERTIFICATE OF SERVICE

The undersigned certifies that he is a member at Cox  
Ferguson & Wham, LLC and that on the \_\_\_\_\_ day of June, 2016  
he served the Motion to Extend Deadline for Filing Petition  
for Rehearing herein by sending it by facsimile transmission  
to Darly G. Hawkins, Esq., at (803) 744-1949. The document  
was received as may be seen from the attached transmission  
report.

  
\_\_\_\_\_

June 23, 2016

\*\*\*\*\*  
\*\*\* FAX TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

JOB NO.	2405
DESTINATION ADDRESS	18037441949
PSWD/SUBADDRESS	
DESTINATION ID	
ST. TIME	06/23 12:01
USAGE T	01' 58
PGS.	3
RESULT	OK

**TO:** DARYL G. HAWKINS, ESQ. @ FAX # (803) 744-1949  
**COMPANY:**

**FROM:** JOHN R. FERGUSON FAX  
Cox & Ferguson  
Attorneys at Law  
P.O. Box 286  
Laurens, SC 29360-0286  
PHONE: (864) 984-2126  
FAX: (864) 984-7372

**RE:** Marion M. Kay Estate

**DATE:** 23 June 2016

**PAGES** 3 (including this one)

**MESSAGE:**

Daryl-

Enclosed please find a corrected Motion to Extend Deadline for Filing Petition for Rehearing with a cover letter.

John

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SC Court of Appeals

In the Matter of the Estate of Marion M. Kay

Edward D. Sullivan, as Personal Representative  
of the Estate of Marion M. Kay, . . . . . Appellant/  
Respondent

v.

Martha Brown and Mary Moses, . . . . . Respondent/  
Appellant

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox  
Ferguson & Wham, LLC and that on the 23 day of June, 2016  
she served the Motion to Extend Deadline for Filing Petition  
for Rehearing herein by depositing a copy of it in the United  
States Mail, postage prepaid and addressed to:

Daryl G. Hawkins, Esq.  
Attorney at Law  
P.O. Box 11906  
Columbia, SC 29211.

Dulvora Ball

June 23, 2016



**COX, FERGUSON & WHAM**

ATTORNEYS AT LAW  
107 E. Laurens St.  
P.O. Box 286  
LAURENS, SOUTH CAROLINA 29360-0286

W. REID COX, JR.  
JOHN R. FERGUSON  
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E-MAIL: jferg@backroads.net

June 24, 2016

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JUN 27 2016

**SC Court of Appeals**

Office of the Clerk of Court  
S.C. Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

Attn.: Amelia

Re: Sullivan v. Brown et al., 2013-002319

Dear Amelia:

With this letter I am enclosing for filing an original and a copy of a Certificate of Service for the above-referenced case. Please file the original and send me a clocked copy in the enclosed envelope.

Sincerely,

*J.R. Ferguson*  
John R. Ferguson

JRF/wp  
Encl.  
CC: Daryl G. Hawkins, Esq.