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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

OCT 11 2016

Letitia H. Verdin, Circuit Court Judge

SC Court of Appeals

Appellate Case No.: 2016-001425

Natasha Turner.....Respondent

Michael T. Kellett and Carmen Kellett.....Appellants

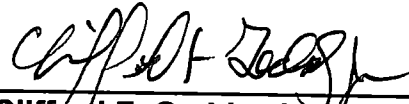
Motion to Extend Time for Initial Brief and Designation of Matter

The undersigned Attorney for the Appellant does hereby move for an additional Thirty (30) days in which to file an Initial Brief and Designation of Matter. The grounds for such Motion are the following:

1. On August 20, 2016, the undersigned received emergency medical care for pneumonia and an irregular and rapid heartbeat from atrial fibrillation which required medical care in the Emergency Room of the Greenville Memorial Hospital.
2. These conditions have required ongoing follow-up medical care and multiple changes to medication which have various side effects.
3. As a result, the undersigned has a reduced work schedule that is not anticipated to change during October.
4. The Transcript was received on September 22, 2016. The Initial Brief and Designation of Matter under the SCACR must be served by October 22, 2016.
5. The undersigned requests that the date for filing and serving the Initial Brief and Designated Matter be extended for Thirty (30) days which will be an

extension to November 22, 2016.

October 7, 2016



Clifford F. Gaddy, Jr., Bar # 002275
408 N. Church St., Ste. B
Greenville, South Carolina 29601
(864) 250-5155
Attorney for Appellants

Other Counsel of Record:

Joseph M. Plaxco, Esq.
707 E. North Street
Greenville, South Carolina, 29601
(864) 240-9119
Attorney for Respondent

R. Frank Plaxco, Esq.
36 Harvest Lane
Greenville, South Carolina 29601
864-232-9828
Attorney for Respondent

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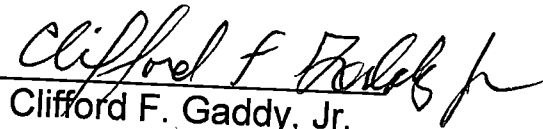
CERTIFICATE OF SERVICE

I hereby certify that I served the Respondent with a copy of a
Motion to Extend Time for Filing the Initial Brief and Designation of Matter
by placing a copy thereof in the United States Mail on the 7th day of
October, 2016 addressed to

Joseph M. Plaxco, Esquire
707 E. North Street
Greenville, South Carolina 29601

R. Frank Plaxco, Esquire
Apt 59, 925 Cleveland Street
Greenville, South Carolina 29601

October 7, 2016


Clifford F. Gaddy, Jr.

Cliff Gaddy Law Firm

Cliff Gaddy
Attorney at Law

office: (864) 250-5155
fax: (864) 233-3750

408 N. Church Street, Suite B
Greenville, SC 29601-2149

email: cfg126@yahoo.com

October 7, 2016

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

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OCT 11 2016

SC Court of Appeals

Re: Natasha Turner v. Michael T. Kellett
Appellate Case No.: 2016-001425

Dear Ms. Kitchings:

The undersigned is attorney for the Appellant in the above-styled case.


We enclose a Motion to Extend Time for Filing the Initial Brief and Designation of Matter (original and seven copies) together with a Certificate of Service.

We also enclose our check for \$25.00 to pay the filing fee.

Please file the enclosed Motion and return a clocked copy to us.

With best wishes,

Sincerely,


Clifford F. Gaddy, Jr.

CFG/msg
Enclosures

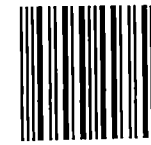
cc:

Carmen and Michael T. Kellett
Joseph M. Plaxco, Esq.
R. Frank Plaxco, Esq.
Paul B. Wickensimer, Clerk of Court
for Greenville County

✓



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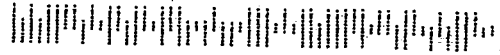


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Cliff Gaddy
Law Firm

40 years of experience on your side.

408 N. Church Street, Suite B
Greenville, SC 29601-2149

The Honorable Jenny Abbott Kitchings
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