

STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarbough, Master in Equity

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Appellate Case No. 2016-001227  
Circuit Case No. 2014-CP-10-2884

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**RECEIVED**  
OCT 21 2016  
SC Court of Appeals

Darryl M. Blaylock,.....Respondent,

versus

Erica Lynn LaMarche, .....Respondent,

and

David S. Chung,.....Proposed Intervenor, Appellant.

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MOTION FOR EXTENSION OF TIME TO FILE INTIAL BRIEF

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The Respondent, Erica Lynn LaMarche, by and through the undersigned, respectfully moves, pursuant to Rule 234(b) of the South Carolina Appellate Court Rules, this Honorable Court for an extension of time in which to file and serve her initial brief on appeal and designation of matter to be included in the record on appeal. The grounds therefor are as follows:

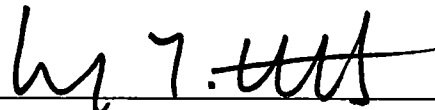
1. The moving party's initial brief and designation expired by way of letter dated from

this honorable court, October 3, 2016, which extended to the undersigned a ten day deadline to file and serve the respondent's initial brief and designation of matter.

2. The undersigned received the October 3, 2016, letter from this honorable court on October 14, 2016, and believes it was not received in a timely manner due to the storm, ~~Michael~~ <sup>Matthew</sup>, that effected most of South Carolina.
3. Due to the undersigned's workload and catching up with his workload from the closures of the storm and outages, the moving party is in need of additional time in which to file and serve an initial brief and designation of matter.
4. If the requested extension is granted, the moving party's initial brief and designation of matter will be due on or before December 1st, 2016.
5. After consultation, counsel for all other parties consent to this extension of time.

**WHEREFORE**, the Respondent, Erica Lynn La Marche, respectfully prays that this Honorable Court grant her an extension until December 1<sup>st</sup>, 2016, in which to file an initial brief and Designation of mater to be included in the record on appeal.

VITETTA LAW GROUP, LLC



Guy J. Vitetta  
225 Seven Farms Drive, Suite #201  
Daniel Island, SC 29492  
(843) 302-2050  
[guy@vitettalawgroup.com](mailto:guy@vitettalawgroup.com)

18 day of October, 2016

Daniel Island, South Carolina

OTHER COUNSEL OF RECORD:

David K. Haller  
115 River Landing Drive, Suite 102  
Charleston, SC 29492  
Attorney for the Proposed Intervenor, Appellant

Darryl Blaylock  
1309 Langford Road  
Mount Pleasant, SC 29464  
*Pro Se- served at last known address*

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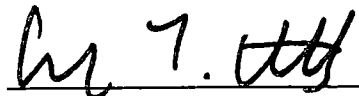
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PROOF OF SERVICE

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I certify that the forgoing Motion for Extension of Time to File Initial Brief has been  
served on all parties of record or their counsel at the address and date shown below.

VITETTA LAW GROUP, LLC



Guy J. Vitetta  
225 Seven Farms Drive, Suite #201  
Daniel Island, SC 29492  
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[guy@vitettalawgroup.com](mailto:guy@vitettalawgroup.com)

18 day of October, 2016

Daniel Island, South Carolina

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Attorney for the Proposed Intervenor, Appellant

Darryl Blaylock  
1309 Langford Road  
Mount Pleasant, SC 29464  
*Pro Se- served at last known address*



October 18, 2016

Jenny Kitchings Abbott, Clerk of Court  
P.O. Box 11629  
Columbia, SC 29211

Re: Darryl Blaylock v. Erica LaMarche (David Chung)  
Appellate Case No. 2016-001227

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SC Court of Appeals

Dear Madame Clerk:

Please find enclosed the original and four (4) copies of the Respondent's Motion for Extension of Time to File Initial Brief. Please file the motion and return the filed copies in the enclosed stamped envelope.

Please do not hesitate to contact me if you require any further information.

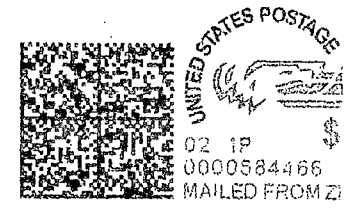
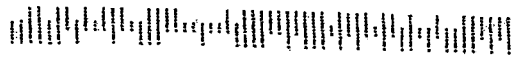
Sincerely,

A handwritten signature in black ink, appearing to read "Guy J. Vitetta", written in a cursive style.

Guy J. Vitetta

Enclosures: as stated  
cc: Erica LaMarch via email  
David K. Haller via email  
Darryl Blaylock, pro se via usps

✓



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DANIEL ISLAND SOUTH CAROLINA 29492  
VitettaFamilyLaw.com

Jenny Kitchings Abbott, Clerk of Court  
P.O. Box 11629  
Columbia, SC 29211

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