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STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

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

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SC Court of Appeals

Darryl M. Blaylock.....Respondent,

v.

Erica Lynn LaMarcheRespondent,

and

David S. ChungProposed Intervenor/Appellant.

**RESPONDENT ERICA LYNN LAMARCHE'S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

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Pro Se

Respondent Erica Lynn LaMarche hereby moves, with consent of the Appellant, for an extension of time to file and serve Respondent's initial brief and designation of matter due to retention of new appellate counsel.

On November 1, 2016, this court filed an order extending the deadline for serving and filing Respondent's initial brief and designation of matter until November 21, 2016. On November 7, 2016, Respondent retained the law firm of Pierce, HERNs, Sloan and Wilson to represent her as appellate counsel for purposes of the instant appeal. There being only fourteen days for appellate counsel to review the issues pertinent to this appeal and prepare Respondent's initial brief, Respondent respectfully requests an extension of 30 days from the present deadline of November 21, 2016, or until December 21, 2016. Counsel for Appellant has no objection to this extension.

While Respondent acknowledges that the deadline has already been extended, this extension is necessary and warranted given the abbreviated timeline for the newly retained appellate counsel. Accordingly, Respondent Erica Lynn LaMarche respectfully requests that the time for filing and service of Respondent's initial brief and designation of matter be extended until December 21, 2016.

Respectfully submitted,



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November 7, 2016

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
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Mikell R. Scarborough, Master-In-Equity

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David S. Chung.....Proposed Intervenor/Appellant.

PROOF OF SERVICE

I certify that on the 7th day of November, 2016, I served a copy of Respondent Erica LaMarche's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter to counsel of record by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following addresses:

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November 7, 2016

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November 7, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
1220 Senate Street
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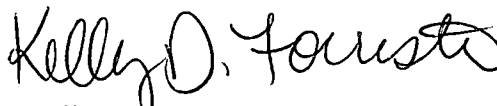
Re: *Darryl M. Blalock v. Erica Lynn Lamarche and David S. Chung*

Dear Ms. Kitchings:

Enclosed the please find the original and six (6) copies of the Respondent Erica Lynn LaMarche's Motion for Extension of Time to File Initial Brief and Designation of Matter in the above referenced matter. Please file the same and return a clocked in copy to our office via the enclosed envelope. Should you have any questions or concerns, please do not hesitate to contact our office.

With kind regards,

Sincerely,




Kelly D. Forrester
Paralegal to Kristen B. Fehsenfeld, Esq.

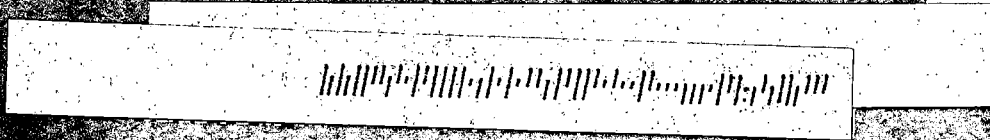
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cc: David K. Haller, Esq.
Darryl Blaylock

J



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