

PIERCE, HERNS, SLOAN & WILSON, LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE HOUSE • 321 EAST BAY STREET
CHARLESTON, SOUTH CAROLINA 29401

POST OFFICE BOX 22437
CHARLESTON, SOUTH CAROLINA 29413

(843) 722-7733

(843) 722-7732 FAX

www.phswlaw.com

M. TODD RAINSFORD
KRISTEN B. FEHSENFELD
CHRISTINA L. PERRIN
BENJAMIN C. SMOOT, II ✕
J. MORGAN FORRESTER
T.A.C. HARGROVE II

✕ MEMBER SC & VA BAR

CARL E. PIERCE, II
LOUIS P. HERNS
ALLAN P. SLOAN, III *♦
JOSEPH C. WILSON, IV †
JAMES G. KENNEDY
WILLIAM P. EARLY ●
SONALY K. HENDRICKS +
GREGG MEYERS ▲

* MEMBER SC & FL BAR

♦ CERTIFIED SC CIRCUIT
COURT MEDIATOR

† MEMBER SC, FL & GA BAR

+ SPECIAL COUNSEL

▲ OF COUNSEL

● MEMBER SC & TN BAR

Direct Dial: (843) 725-7726

Email: kellyforrester@phswlaw.com

November 7, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

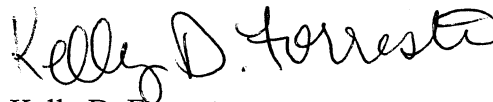
Re: *Darryl M. Blalock v. Erica Lynn Lamarche and David S. Chung*

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.

KBF/kdf

cc: David K. Haller, Esq.
Darryl Blaylock

**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

Darryl M. Blaylock.....Respondent,

v.

Erica Lynn LaMarcheRespondent,

and

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

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

Guy Vitetta, Esquire
VITETTA LAW GROUP
225 Seven Farms Drive #201
Daniel Island, SC 29492

Kristen B. Fehsenfeld, SC Bar #76971
PIERCE, HERNS, SLOAN & WILSON, LLC
P.O. Box 22437
Charleston, SC 29402
Phone: (843)722-7733; Fax: (843)722-7732
kristenfehsefeld@phswlaw.com

Attorneys for Respondent Erica Lynn LaMarche

COUNSEL OF RECORD:

HALLER LAW FIRM, P.C.

David K. Haller

115 River Landing Drive, Suite 102

Charleston, SC 29492

(843) 849-1384

dhaller@hallerlawfirm.com

Attorneys for Proposed Intervenor/Appellant David S. Chung

Darryl Blaylock

1309 Langford Road

Mount Pleasant, SC 29464

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,



Kristen B. Fehsenfeld, SC Bar #76971
PIERCE, HERNS, SLOAN & WILSON, LLC
P.O. Box 22437
Charleston, SC 29402
Phone: (843)722-7733; Fax: (843)722-7732
kristenfehsefeld@phswlaw.com

Guy Vitetta, Esquire
VITETTA LAW GROUP
225 Seven Farms Drive #201
Daniel Island, SC 29492
Attorneys for Respondent Erica Lynn LaMarche

November 7, 2016

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

Darryl M. Blaylock.....Respondent,

v.

Erica Lynn LaMarcheRespondent,

and


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:

HALLER LAW FIRM, P.C.
David K. Haller
115 River Landing Drive, Suite 102
Charleston, SC 29492
(843) 849-1384
dhaller@hallerlawfirm.com
Attorneys for Proposed Intervenor/Appellant David S. Chung

Darryl Blaylock
1309 Langford Road
Mount Pleasant, SC 29464
Pro Se –last known address



Kristen B. Fehsenfeld, SC Bar #76971
PIERCE, HERNS, SLOAN & WILSON, LLC
P.O. Box 22437
Charleston, SC 29402
Phone: (843)722-7733; Fax: (843)722-7732
kristenfehsefeld@phswlaw.com

Guy Vitetta, Esquire
VITETTA LAW GROUP
225 Seven Farms Drive #201
Daniel Island, SC 29492
Attorneys for Respondent Erica Lynn LaMarche

November 7, 2016