

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. SUPREME COURT

APPEAL FROM LAURENS COUNTY
COURT OF COMMON PLEAS

Civil Action No. 2012-CP-30-258
The Honorable Frank R. Addy, Circuit Court Judge

Opinion No. 2016-5414 Filed June 15, 2016
Withdrawn, Substituted and Refiled November 2, 2016

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,~~ ^{Petitioner}

vs.

Martha Brown and Mary Moses ~~Respondents-Appellants,~~

MOTION FOR EXTENSION OF TIME TO FILE
PETITION FOR WRIT OF CERTIORARI

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME
COURT:

Pursuant to Rule 240, SCACR, Appellant-Respondent Edward D. Sullivan, as Personal Representative of the Estate of Marion M. Kay, respectfully moves this Court for an Order granting him an extension of time to file a Petition for a Writ of Certiorari. The current deadline is December 2, 2016. Appellant-Respondent respectfully requests a fourteen

(14) day extension, which would place the new deadline at December 16, 2016.

This case is governed by the Court's order *RE: Extension in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals*, S.C. Sup. Ct. Order dated July 16, 2014 (Shearouse Adv. Sh. No. 28 at 1.) Due to the upcoming holidays and other commitments, Counsel for Appellant-Respondent expects more time will be needed to adequately address the novel and complicated issues arising in this matter.

Appellant-Respondent sought the consent of the Respondent-Appellants' counsel prior to filing this motion but was unable to do so.

Appellant-Respondent greatly appreciates the Court's time, attention, and consideration with regard to this request.

RESPECTFULLY SUBMITTED,

LAW OFFICE OF DARYL G. HAWKINS, LLC

By: 

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November 21, 2016

Attorney for Appellant/Cross-Respondent

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vs.


Martha Brown and Mary Moses Respondents-Appellants.

PROOF OF SERVICE

I certify that I served the Motion for Extension of Time to File Petition for Writ of
Certiorari via U.S. Mail upon:

John. R Ferguson, Esquire
Cox Ferguson & Wham, LLC
PO Box 286
Laurens, SC 29360-0286

LAW OFFICE OF DARYL G. HAWKINS, LLC

By: 
Edwin Morgan
Legal Assistant to Daryl. G. Hawkins