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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
R. Knox McMahon, Presiding Judge, First Judicial Circuit

Case No. 2016-CP-18-00604

Appellate Case No. 2016-001763

Heather Southard,

Respondent,

v.

Joyce Hagan Owens,

Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Sean A. O'Connor
FINKEL LAW FIRM, LLC
4000 Faber Place Drive, Suite 450
North Charleston, SC 29405
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Facsimile: (866) 800-7954
soconnor@finkellaw.com
Attorneys for Appellant

COMES NOW Appellant Joyce Hagan Owens, by and through her undersigned counsel, and hereby moves before this Court for an extension of time to serve the *Initial Brief of Appellant* and Appellant's *Designation of Matter* upon the Respondent and file same with the Court. In support of this Motion, Appellant states as follows:

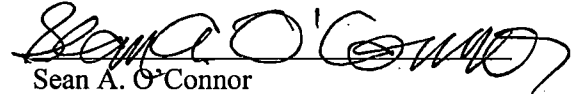
1. Appellant received on November 11, 2016 a copy of the Transcript of Record for the June 28, 2016 appeal hearing (appealing Magistrate Court dispositive order and judgment), which June 28 hearing preceded and led to the Court of Common Pleas order from which Appellant is now appealing.
2. Appellant's Initial Brief and Designation of Matter are due on December 12, 2016.
3. The undersigned counsel is working diligently to complete Appellant's Initial Brief and Designation of Matter, however, due to a substantial case load, other pressing deadlines, and previously planned holiday travel, Appellant's counsel has respectfully requested that Respondent consent to an extension of time to file and serve same.
4. Respondent's counsel, on behalf of Respondent, consented in writing via email to the requested thirty (30) day extension of time to file and serve Appellant's Initial Brief and Designation of Matter, with the new due date to be on January 11, 2016.
5. The undersigned counsel represents that this Motion is being filed in good faith and not for the purpose of delay.

WHEREFORE, Appellant Joyce Hagan Owens respectfully requests that this Honorable Court enter an Order granting Appellant an extension of time of thirty (30) days in which to file her Initial Brief and Designation of Matter, and any other relief this Court deems just and proper.

[SIGNATURE PAGE FOLLOWS]

Heather Southard v. Joyce Hagan Owens
Appellate Case No. 2016-001763
APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INTIAL BRIEF

Respectfully submitted,



Sean A. O'Connor
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Attorneys for Appellant

December 1, 2016

Opposing Counsel

Jean-Marie E. Mille
Attorney and Counselor at Law
2231 Devine Street, Suite 303
Columbia, SC 29205
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Facsimile: (803) 779-0615
jme1000@sc.rr.com
Attorney for Respondent

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
R. Knox McMahon, Presiding Judge, First Judicial Circuit

Case No. 2016-CP-18-00604

Appellate Case No. 2016-0001763

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SC Court of Appeals

Heather Southard,

Respondent,

v.

Joyce Hagan Owens,


Appellant.

PROOF OF SERVICE

The undersigned hereby states that on the 15th day of December, 2016, she caused a true and correct copy *Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter* in the above-captioned matter to be served upon all interested Parties by having the same deposited in the United States mail, proper postage affixed, addressed as follows:

Jean-Marie E. Mille
Attorney and Counselor at Law
2231 Devine Street, Suite 303
Columbia, SC 29205
Attorney for Respondent

Respectfully submitted,


Malena A. Dinwoodie
Litigation Paralegal
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In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
R. Knox McMahon, Presiding Judge, First Judicial Circuit

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SC Court of Appeals

Case No. 2016-CP-18-00604

Appellate Case No. 2016-0001763

Heather Southard,

Respondent,

v.

Joyce Hagan Owens,

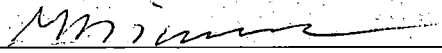
Appellant.

PROOF OF SERVICE

The undersigned hereby states that on the 1st day of December, 2016, she caused a true and correct copy *Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter* in the above-captioned matter to be served upon all interested Parties by having the same deposited in the United States mail, proper postage affixed, addressed as follows:

Jean-Marie E. Mille
Attorney and Counselor at Law
2231 Devine Street, Suite 303
Columbia, SC 29205
Attorney for Respondent

Respectfully submitted,


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FINKEL
LAW FIRM LLC

MALENA A. DINWOODIE, PARALEGAL
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December 1, 2016

REPLY TO:
CHARLESTON LITIGATION

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SC Court of Appeals

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

Re: *William Wyly v. Joyce H. Owens*
C/A No. 2016-CP-18-00603
Appellate Case No. 2016-001762

Heather Southard v. Joyce H. Owens
C/A No. 2016-CP-18-00604
Appellate Case No. 2016-001763

Our File Number: 78225.50598

Dear Ms. Kitchings:

Enclosed for filing, please find the following documents:

- (1) *Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter* regarding the matter of *Wyly v. Owens* (2016-001762);
- (2) *Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter* regarding the matter of *Southard v. Owens* (2016-001763);
- (3) *Proofs of Service* for each Motion.

I have included the originals and one copy of each of the above listed documents, as well as Finkel Law Firm checks numbered 62619 and 62620 for the Motion filing fees. At your convenience, please have the originals filed and return the file-stamped copy to our office using the enclosed self-addressed envelope.

Thank you for your assistance with this matter. If you have any questions or concerns, please contact me at your convenience.

With warmest regards, I am

Yours very truly,



Malena A. Dinwoodie
Litigation Paralegal

/mad

cc: Jean-Marie Mille, Esq.

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