

81804

RECEIVED

DEC 05 2016

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-18-00603
Appellate Case No. 2016-001762

William Reid Wyly,

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
Telephone: (843) 576-6348
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:

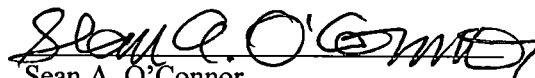
1. Appellant received on November 11, 2016 a copy of the Transcript of Record for the June 28, 2016 appeal hearing (appealing Magistrate Court dispositive order and judgment), which June 28 hearing preceded and led to the Court of Common Pleas order from which Appellant is now appealing.
2. Appellant's 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]

William Reid Wyly v. Joyce Hagan Owens
Appellate Case No. 2016-001762
APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INTIAL BRIEF

Respectfully submitted,



Sean A. O'Connor
FINKEL LAW FIRM LLC
4000 Faber Place Drive, Suite 450
North Charleston, South Carolina 29405
(843) 577-5460
soconnor@finkellaw.com

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
Telephone: (803) 254-8000
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-18-00603

Appellate Case No. 2016-0001762

RECEIVED

DEC 05 2016

SC Court of Appeals

William Reid Wyly,

Respondent,

v.

Joyce Hagan Owens,

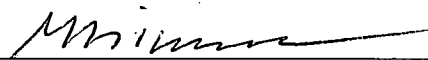
Appellant.

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,

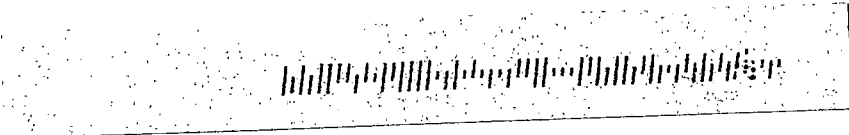

Malena A. Dinwoodie
Litigation Paralegal
FINKEL LAW FIRM LLC
4000 Faber Place Drive, Suite 450
North Charleston, South Carolina 29405
Telephone: 843.577.5460
Facsimile: 866.800.7954
mdinwoodie@finkellaw.com



U.S. POSTAGE >> PITNEY BOWES



ZIP 29405 \$ 001.78⁰
02 1W
0001399679 DEC. 02. 2016



FINKEL
LAW FIRM LLC

4000 Faber Place Drive, Suite 450
North Charleston, SC 29405

md/78225.50598

RECEIVED

DEC 05 2016

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