

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 28 2017

SC Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable S. Jackson Kimball, III, Special Circuit Court Judge

Case No.: 2015-CP-46-01409  
Appellate Case No. 2016-001921

Courtney Feeley Karp, et al.,

Appellant,

v.

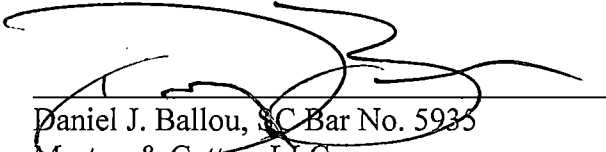
Hugh Dereede, et al.

Respondent.

RESPONDENTS' MOTION TO EXTEND TIME TO PREPARE AND SERVE  
INITIAL BRIEF

Respondent Hugh Dereede, by and through its undersigned counsel, move for an extension of time through May 31, 2017, to prepare and serve Respondent's Initial Brief. In support of this motion, Counsel would show that they require additional time to adequately prepare the Brief. Counsel certifies that prior to filing this Motion, he consulted with Appellant and Appellant consented to the extension request.

May 26, 2017  
Rock Hill, South Carolina

  
Daniel J. Ballou, SC Bar No. 5935  
Morton & Gettys, LLC  
Attorney for Respondent  
P.O. Box 707  
Rock Hill, SC 29731  
T: 803.366.3457  
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Other Counsel of Record:

Desa Ballard

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West Columbia, South Carolina 29171

Peter J. Nosal

852 Gold Hill Road; Suite 201

Fort Mill, South Carolina 29708

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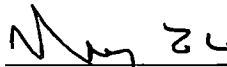
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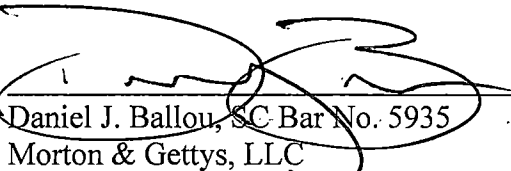
Hugh Dereede, et al.

Respondent.

**PROOF OF SERVICE**

The undersigned certifies that he has served this Motion for Extension of Time to File Respondent's Initial Brief on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on April \_\_, 2017, addressed to its attorney of record, Desa Ballard, P.O. Box 6338, West Columbia, South Carolina 29171 and Peter J. Nosal, 852 Gold Hill Road; Suite 201, Fort Mill, South Carolina 29708.

 , 2017  
Rock Hill, South Carolina

  
Daniel J. Ballou, SC Bar No. 5935  
Morton & Gettys, LLC  
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MORTON & GETTYS  
ATTORNEYS AT LAW

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SC Court of Appeals

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MICHAEL K. HATCH ‡

MELISSA G. CASSELL §

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Certified Civil Court Mediator \*  
Certified Family Court Mediator †  
Certified Specialist in Estate Planning  
and Probate Law ‡

Licensed in SC & NC §  
Licensed in SC, GA, FL & NC ‡  
Licensed in SC, TX (Inactive) •

April 26, 2017

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: ***In re: Deborah Dereede Living Trust dated December 18, 2013***  
**Appellate Case No. : 2016-001921**

Ms. Kitchings:

Enclosed please find the original and one copy of the Respondents' motion to extend time to prepare and serve initial brief. Also, enclosed you will find our firm's check in the amount of \$25.00 (Twenty-Five and 00/100 dollars) for the cost of this motion.

Please file the original and return the clocked copy in the self-addressed stamped envelope provided. Please do not hesitate to contact our office with any questions. I can be reached directly at 803-366-3425. With kind regards, I am

Sincerely,

  
Leah Anderson McCraney  
Paralegal for Daniel J. Ballou

DJB/lm

enclosure

cc: CLIENT (via electronic mail)  
Pete Nosal, Esquire (via electronic and regular mail)  
Desa Ballard, Esquire (via electronic and regular mail)

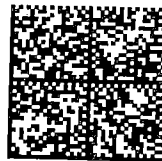
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