

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JUN 08 2017

SC Court of Appeals

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

STEPHEN A. SPITZ, SPECIAL REFEREE

APPELLATE CASE NO.: 2016-001878
CASE NO.: 2015-CP-07-1931

JULIA TOMPKINS EWING,

Respondent,

vs.

KEITH A. GUEST and STEPHANIE C. GUEST and
PLEASANT POINT PROPERTY OWNERS ASSOCIATION, INC.,

Defendants

OF WHOM

KEITH A. GUEST and STEPHANIE C. GUEST are

Appellants.

NOTICE OF MOTION AND MOTION FOR
EXTENSION OF TIME TO FILE APPELLANTS' INITIAL REPLY BRIEF

The Appellants would respectfully request an extension of time within which to file the Initial Reply Brief. The Appellants' Initial Reply Brief is due to be filed no later than June 5, 2017. The Appellants would respectfully request a fifteen (15) day extension of time in which to file the same.


This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Respondent.

It is accordingly respectfully requested that the Appellants be granted until June 19, 2017

✓

to file the Appellants' Initial Reply Brief.

MOSS, KUHN & FLEMING, P.A.

By:  _____

H. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina
June 5, 2017

Attorneys for Appellants

CERTIFICATE OF SERVICE

Undersigned certifies that the Notice of Motion and Motion for Extension of Time to File Appellants' Initial Reply Brief, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Christopher Inglese, Esquire
David Tedder, Esquire
604-A Bladen Street
Beaufort, South Carolina 29902

James B. Richardson, Jr., Esquire
1229 Lincoln Street
Columbia, South Carolina 29201

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in a post office or official depository under the exclusive care and custody of the United States Postal Service, on June 5, 2017.

MOSS, KUHN & FLEMING, P.A.

By: 
Sue Radford

LAW OFFICES

MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
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*ALSO MEMBER OF GA BAR

June 5, 2017

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SC Court of Appeals

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

RE: Julia Tompkins Ewing v. Keith A. Guest and Stephanie C. Guest and Pleasant
Point Property Owners Association, Inc.
Appellate Case No.: 2016-001878

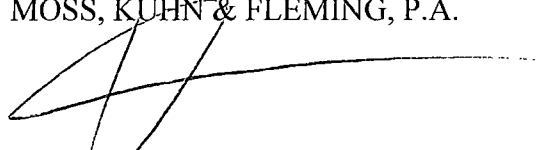
Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter along with my firms check in the amount of \$25.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of this motion on all counsel of record.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.



H. Fred Kuhn, Jr.
HFKjr:sr
Enclosures

cc: David L. Tedder, Esquire (w/enclosure)
Christopher Inglese, Esquire (w/enclosure)
James B. Richardson, Jr., Esquire (w/enclosure)

^{HF}K
MOSS, KUHN & FLEMING, P.A.
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