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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master-In-Equity and Special Circuit Court Judge

RECEIVED

Appellate Case No. 2017-000242

JUN 12 2017

SC Court of Appeals

Robert E. Feldman and Lois J. Feldman. Appellants,

vs.

Gary P. Coggin, Respondent.

**APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE THE INITIAL REPLY
BRIEF OF APPELLANTS AND ANY ADDITIONS TO APPELLANTS' DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

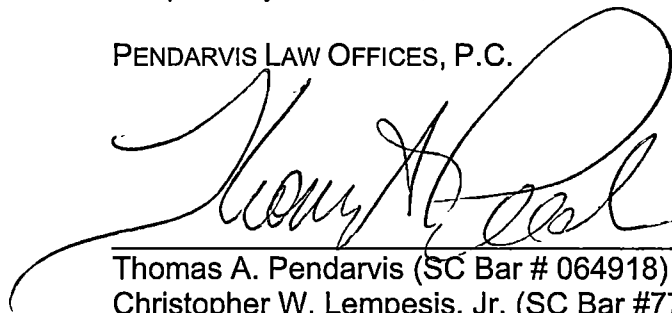
Pursuant to Rule 240, SCACR, Appellants Robert E. Feldman and Lois J. Feldman, through their undersigned counsel, hereby move this Honorable Court for an extension of time for thirty (30) additional days from the existing June 12, 2017 due date, until July 12, 2017, to file and serve their Initial Reply Brief of Appellants as well as any additions to Appellants' Designation of Matter to be Included in the Record on Appeal. Counsel for the Respondent has provided their consent to this request.

CONCLUSION

Counsel respectfully requests this thirty (30) day extension until July 12, 2017, to allow time to properly prepare, file and serve their Initial Reply Brief of Appellants as well as any additions to Appellants' Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, appearing to read 'Thomas A. Pendarvis', written over a horizontal line.

Thomas A. Pendarvis (SC Bar # 064918)
Christopher W. Lempeis, Jr. (SC Bar #77012)
710 Boundary Street, Suite 1-A
Beaufort, SC 29902
843.524.9500 Tel.
Thomas@PendarvisLaw.com
Chris@PendarvisLaw.com

Counsel for Appellants, Robert E. Feldman and
Lois J. Feldman

Beaufort, South Carolina

June 8, 2017

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

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SC Court of Appeals

Appellate Case No. 2017-000242

Robert E. Feldman and Lois J. Feldman. Appellants,

vs.

Gary P. Coggin, Respondent.

PROOF OF SERVICE

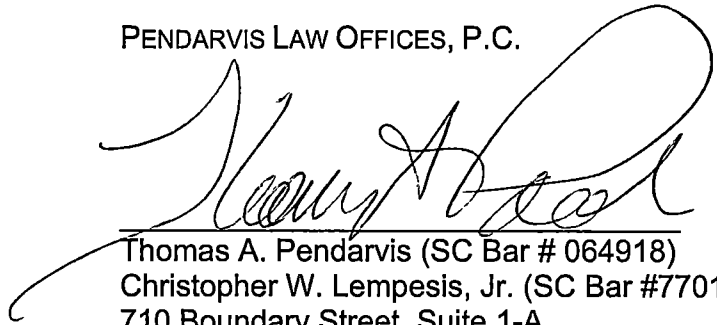
I, Thomas A. Pendarvis, a lawyer with PENDARVIS LAW OFFICES, P.C., certify that I have served one (1) copy of APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE THE INITIAL REPLY BRIEF OF APPELLANTS AND ANY ADDITIONS TO APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL on counsel for Respondent, by depositing a copy of the same in the United States Mail, postage prepaid, on the 8th day of June, 2017 addressed as follows:

M. Dawes Cooke, Jr., J.D.
Jeffery M. Bogdan, J.D.
BARNWELL, WHALEY, PATTERSON & HELMS, LLC
PO. Drawer H
Charleston, SC 29402
mdc@barnwell-whaley.com
jbogdan@barnwell-whaley.com

Counsel for Respondent, Gary P. Coggin

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, appearing to read "Thomas A. Pendarvis", is written over a horizontal line. The signature is fluid and cursive.

Thomas A. Pendarvis (SC Bar # 064918)
Christopher W. Lempeis, Jr. (SC Bar #77012)
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Counsel for Appellants, Robert E. Feldman and
Lois J. Feldman

Beaufort, South Carolina

June 8, 2017

PENDARVIS LAW OFFICES, PC



June 8, 2017

VIA US MAIL

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED

JUN 12 2017

SC Court of Appeals

Re: **Robert E. Feldman and Lois J. Feldman vs. Gary P. Coggin**
Appellate Case No.: 2017-00024

APPELLANTS' FIRST REQUEST FOR EXTENSION OF TIME TO FILE THE INITIAL REPLY BRIEF OF APPELLANT AND APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Dear Ms. Kitchings:

Please allow this correspondence to serve as Appellants' first request to enlarge time for Appellants to file the *Initial Reply Brief of Appellants* and any additions to *Appellants' Designation of Matter to be Included in the Record on Appeal* with the Court of Appeals in the above referenced matter. Currently the *Initial Reply Brief of Appellants* is due on June 12, 2017. Appellants respectfully request a thirty (30) day extension to file their Initial Reply Brief of Appellants. This is Appellants' first request for extension of time for the Initial Reply Brief of Appellants.

Appellants have been provided consent to this request from the Respondent's counsel per an email from Jeffery M. Bogdan on June 8, 2017.

Enclosed please find an original and seven (7) copies of APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE THE INITIAL REPLY BRIEF OF APPELLANTS AND ANY ADDITIONS TO APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL along with PROOF OF SERVICE and a check in the amount of \$25.00 to serve as the filing fee for this request. Kindly file the original and six copies, and return the seventh clocked copy to me in the enclosed postage prepaid, self-addressed envelope.

If you have any questions or would like to discuss this, please feel free to call or email me. Thank you in advance for your attention to this matter.

THOMAS A. PENDARVIS, J.D.
Admitted in SC and GA
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Board Certified in Legal Malpractice
by the American Board of
Professional Liability Attorneys

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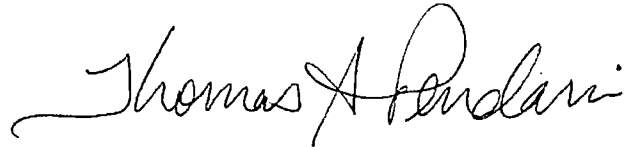
✓

Jenny Abbott Kitchings, Clerk of Court
Page 2
June 8, 2017

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis

TAP/ses

Enclosures

cc w/encls: M. Dawes Cooke, Jr., J.D.

Jeffery M. Bogdan, J.D.

ec w/encls: Mr. & Mrs. Robert E. Feldman

Pendarvis Law Offices, P.C.
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The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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