

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

JUL 20 2017

SC Court of Appeals

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 RECORD ON APPEAL

The Appellants would respectfully request an extension of time within which to file the Record on Appeal. The Record on Appeal is due to be filed no later than July 14, 2017. The Appellants would respectfully request a thirty (30) 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 August 14,



2017 to file the Record on Appeal.

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
July 14, 2017

Attorneys for Appellants

CERTIFICATE OF SERVICE

Undersigned certifies that the Notice of Motion and Motion for Extension of Time to File Record on Appeal, 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:

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

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

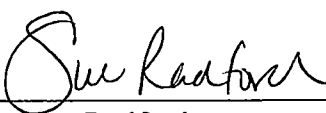
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in a post office or official depository under the exclusive care and custody of the United States Postal Service, on July 14, 2017.

MOSS, KUHN & FLEMING, P. A.

By: 

Sue Radford

LAW OFFICES

MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
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TELEPHONE 843-524-3373
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*ALSO MEMBER OF GA BAR

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SC Court of Appeals

July 14, 2017

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 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

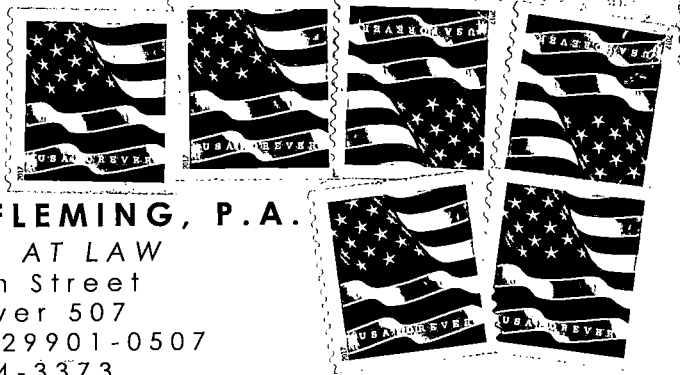
Very truly yours,

MOSS, KUHN & FLEMING, P.A.



H. Fred Kuhn, Jr.
HFKjr:sr
Enclosures

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



MOSS, KUHN & FLEMING, P.A.

ATTORNEYS AT LAW

1501 North Street

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Guest

To:

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