

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2017-000882

In Re: Eleanor McCarthy Lenahan Trust under agreement Dated July 12, 2001.

Kathleen Suzanne Heslin and Maureen Teresa Mosley, in their capacities as
Cotrustees of the Eleanor McCarthy Lenahan Trust under agreement
dated July 12, 2001.....Appellants,

v.

Mary Kathleen Lenahan, individually and in her capacity as Trustee of the
Art. X(35) MKL Trust Share UAD 071201, Jean Marie Qualliu, Joan Eleanor
DeMaio, and Christine Ann LenahanRespondents,

Of Whom Mary Kathleen Lenahan and Jean Marie Qualliu are Respondents.

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

Pursuant to South Carolina Appellate Court Rule 263(b), Appellant hereby moves for an extension of thirty (30) days from the existing deadline to file his Initial Reply Brief and any supplemental Designation of Matter to be Included in the Record on Appeal in this matter on the following grounds: Respondents filed their Initial Brief on November 3, 2017, though Appellants' counsel only received an electronic copy of same on November 7, 2017 (and has yet to receive the hard copy as of this motion). As Appellants' counsel has only six days before the deadline to file the Initial Reply Brief, and given that he is preparing for longstanding plans to be out of the country



[The text in this section is extremely faint and illegible. It appears to be a multi-paragraph document, possibly a letter or a report, but the specific words and sentences cannot be discerned.]

this month, Appellants' counsel believes he will be unable to prepare a proper Reply without additional time beyond the current deadline.

Appellant's Initial Reply Brief and any supplemental Designation of Matter to be Included in the Record of Appeal will be due on or before December 13, 2017 if the extension is granted.

Respectfully submitted,



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Attorneys for Appellants

November 8, 2017

I:\H to M Clients\Heslin, Kathleen - BL026\Appeal\motion - ext of time - file initial reply brief.wpd

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PROOF OF SERVICE

I certify that I have served the Motion For Extension Of Time To File Appellants' Initial Reply Brief upon Respondents Mary Kathleen Lenahan and Jean Marie Qualliu by depositing a copy of same in the United States Mail, postage prepaid, on November 8, 2017, addressed to Respondents' attorney of record, Kelly M. Jolley, Esquire.



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November 8, 2017

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

RE: *In Re: Eleanor McCarthy Lenahan Trust under agreement dated July 12, 2001; Kathleen Suzanne Heslin and Maureen Theresa Mosley, et al. v. Mary Kathleen Lenahan, et al.*
Appellate Case No. 2017-000882

Dear Ms. Kitchings:

Please find enclosed the original and one copy each of the Appellants' Motion For Extension Of Time To File Appellants' Initial Reply Brief, and a Proof of Service for same. Please file the originals and returned the clocked-copies to me via the enclosed, self-addressed stamped envelope.

With kind, personal regards, I am

Sincerely,

BOLCHOZ LAW FIRM, PA

Sean Michael Bolchoz
SENDER'S E-MAIL ADDRESS:
SBOLCHOZ@BOLCHOZLAW.COM

SMB/kgb
Enclosures

cc: Kelly M. Jolley, Esquire (w/encl.)
Douglas S. Delaney, Esquire (via email only to doug@delaneylawfirm.com)
Kathleen Heslin (via email only to kiheslin@yahoo.com)
Maureen Mosley (via email only to mosley745@gmail.com)

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