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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable J.C. Nicholson, Jr., Circuit Court Judge

RECEIVED
DEC 07 2017
SC Court of Appeals

Case No.: 2016-CP-10-1849
Appellate Court Case No. 2017-001620

Robert N. Baty.....Appellant,

v.

Lydia B. Welling Respondent.

**RESPONDENT LYDIA B. WELLING'S MOTION FOR EXTENSION OF TIME TO
FILE AN INITIAL BRIEF AND/OR A MOTION TO DISMISS**

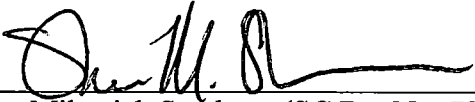
Respondent Lydia B. Welling, by and through her undersigned counsel, respectfully requests a thirty (30) day extension of time to file Respondent's Initial Brief, Designation of Matter for Record, and/or a Motion to Dismiss. The reason for this request is the unexpected workload of Respondent's counsel in other pending matters in conjunction with the holidays.

For the above-stated reasons, on behalf of Respondent Lydia B. Willing, I respectfully request the Court grant Respondent a thirty (30) day extension of time. If this Motion is granted, the Respondent's Initial Brief and/or or Motion will be due on or before January 12, 2018. This is movant's first request for an extension of this deadline.

✓

Respectfully Submitted,

ANDERSON REYNOLDS & STEPHENS, LLC

By: 

Shanna Milcetic Stephens (SC Bar No. 72012)

Thomas F. Drazan (SC Bar No. 101180)

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Attorneys for Lydia B. Welling

Charleston, South Carolina

Dated: December 5, 2017

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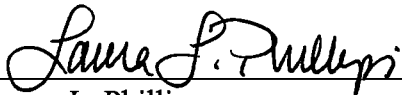
PROOF OF SERVICE

The undersigned hereby certifies that on the date indicate below, she served the following counsel with a copy of the Motion for Extension of Time by mailing copies of same via United States Mail with first class postage prepared to the following addresses:

Samuel B. Cooper, Jr., Esquire
Green Law Firm, LLC
3511 Rivers Avenue
P.O. Box 70306
Charleston, SC 29415

Johnny J. Stewart, Esquire
Clawson and Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492

December 5, 2017
Charleston, SC



Laura L. Phillips
ANDERSON REYNOLDS & STEPHENS, LLC

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December 5, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street (29201)
P.O. Box 11629
Columbia, SC 29211

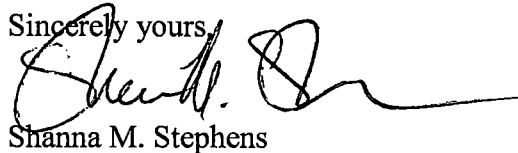
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Re: Robert N. Baty v. Lydia B. Welling and Amanda L. Lockman
Case #: 2016-CP-10-1849
Appellate Case No.: 2017-001620
Claim #: 01-B1G7749D-100005
AR & S #: 20160.26

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Lydia B. Welling's Motion for Extension of Time and Proof of Service in the above-referenced matter. Upon filing, please return one (1) clocked copy of the Motion and Proof of Service to me in the self-addressed, postage paid envelope enclosed. Also enclosed is our firm's check in the amount of \$25.00 for the corresponding fee.

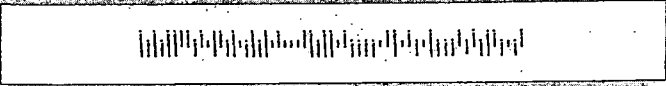
Sincerely yours,



Shanna M. Stephens

SMS/lp
Enclosure

cc: Samuel B. Cooper, Jr., Esquire
Johnny J. Stewart, Esquire



ANDERSON REYNOLDS & STEPHENS, LLC
37 1/2 Broad Street
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Charleston, S.C. 29402

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