

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

DEC 12 2017

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

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 AMENDED MOTION FOR EXTENSION OF  
TIME TO FILE AN INITIAL BRIEF**


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. Welling, 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 amended 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 8, 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 Amended 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 8, 2017  
Charleston, SC



Laura L. Phillips  
ANDERSON REYNOLDS & STEPHENS, LLC

# ANDERSON REYNOLDS & STEPHENS, LLC

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December 8, 2017

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

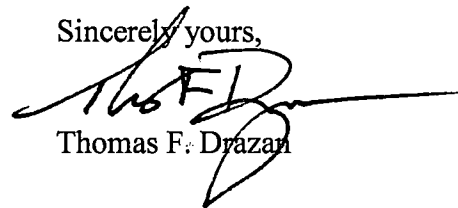
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Re: Robert N. Baty v. Lydia B. Welling and Amanda L. Lockman  
Case #: 2016-CP-10-1849  
Appellate Case No.: 2017-001620  
Claim #: 01-B1G7749D-100005  
AR & S #: 20160.26

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Lydia B. Welling's Amended 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.

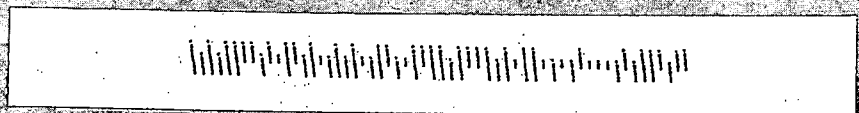
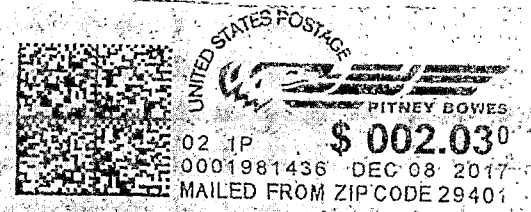
Sincerely yours,



Thomas F. Drazan

TFD/llp  
Enclosure

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



**ANDERSON REYNOLDS & STEPHENS, LLC**

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Charleston, S.C. 29402

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