

RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

APPEAL FROM Horry COUNTY  
Court of Common Pleas

DEC 18 2017

Nate Fata, Special Referee

SC Court of Appeals

Lower Court Case No. 2016-CP-26-8032  
Court of Appeals Case No. 2017-001817

Daniel Eric Knight,

Respondent,

v,

Phillip Ray Causey,

Appellants.

**RESPONDENT'S MOTION  
FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

**YOU WILL PLEASE TAKE NOTICE** that Respondent's by and through their undersigned attorneys, hereby moves this Honorable Court, for an extension of time requesting a thirty day extension of time to file Respondent's initial brief.

The grounds for this Motion are as follows:

1. Appellant's initial brief was filed on November 30, 2017. Accordingly, Respondent's initial brief is due on or about December 30, 2017.

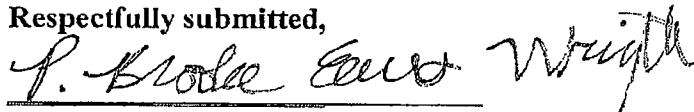
2. Due to the Holiday season, Respondent's counsel is respectfully requesting a thirty day extension to file Respondent's initial brief which would make Respondent's initial brief due on January 30, 2018.

This motion is supported by the South Carolina Rules of Civil Procedure, applicable case law, the trial transcript and exhibits, and any affidavits and/or additional memoranda submitted in

support of the Motions and any other materials the Court may receive at or prior to the hearing on these Motions.

For the reasons stated herein and upon oral argument, Respondent respectfully requests that the Court grant a thirty day extension making Respondent's initial brief due on January 30, 2018.

**Respectfully submitted,**



Ian D. Maguire, Esquire

SC Bar No.: 66587

P. Brooke Eaves Wright, Esquire

SC Bar No.: 102021

**MAGUIRE LAW FIRM**

1600 North Oak Street, Suite B

Myrtle Beach, South Carolina 29577

Telephone: (843) 361-7549

Facsimile: (843) 361-7048

**Attorneys for Respondent**

Blake A. Hewitt, Esquire

Bluestein, Nichols, Thompson & Delgado, LLC

PO Box 7965

Columbia, South Carolina 29202

**Attorney for Respondent**

Myrtle Beach, South Carolina

12/12, 2017

Other Counsel of Record:

Joseph D. Thompson, III, Bar No. 66580

111 Coleman Boulevard, Suite 301

Mount Pleasant, South Carolina 29464

(843) 720-3460

**Attorney for Appellant Phillip Ray Causey**

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER HEAT SENSITIVE INK AND MICR HOLOGRAM

**MAGUIRE LAW FIRM LLC  
OPERATING ACCOUNT  
1600 N OAK STREET, SUITE B  
MYRTLE BEACH, SC 29577**

TD BANK  
67-219/539

14607

12/8/2017

PAY TO THE ORDER OF South Carolina Court of Appeals \$ \*\*25.00

Twenty-Five and 00/100 \*\*\*\*\*

DOLLARS

VOID AFTER 60 DAYS

MEMO: Filing Fee: to file Motion

South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

VALID VALID  
VALID VALID  
VALID VALID

*Dan Maguire*  
AUTHORIZED SIGNATURE

⑈014607⑈

Details on Back

Security Features Included

MAGUIRE LAW FIRM LLC / OPERATING ACCOUNT	14607
South Carolina Court of Appeals	12/8/2017
to file motion	25.00
Daniel Eric Knight	

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 DEC 13 2017  
 SC Court of Appeals

TD Operating Account Filing Fee: to file Motion 25.00

**CERTIFICATE OF SERVICE**

I, the undersigned, of the Maguire Law Firm, attorneys for Respondent, hereby certify that I have served the foregoing documents this the 12<sup>th</sup> day of December 2017 via US Mail to the following individual(s) at the following address:

DOCUMENTS SERVED:

- **Respondent's Motion for Extension of Time to File Initial Brief**
- Proof of service of Respondent's Motion for Extension of Time upon the Appellant;
- 6 Copies of the Respondent's Motion for Extension of Time; and
- Requisite \$25.00 filing fee

INDIVIDUALS SERVED:

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia SC 29201


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SC Court of Appeals

Joseph D. Thompson, III, Bar No. 66580  
111 Coleman Boulevard, Suite 301  
Mount Pleasant, South Carolina 29464  
(843) 720-3460  
Attorney for Appellant Phillip Ray Causey

SERVED BY:



Heather Kidder  
Paralegal for Ian D. Maguire, Esquire  
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*Ian D. Maguire\**  
*Brooke Eaves Wright*  
*Brittney F. Jones*

*\*Licensed in North & South Carolina*

P. BROOKE EAVES WRIGHT, ESQUIRE  
 Eaves@maguirelawfirm.com

December 12, 2017

**VIA CERTIFIED US MAIL**

The Honorable Jenny Abbott Kitchings  
 Clerk of Court  
 South Carolina Court of Appeals  
 1220 Senate Street  
 Columbia SC 29201

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SC Court of Appeals

RE: Daniel Eric Knight v. Phillip Ray Causey  
 Lower Court Case No. 2016-CP-26-8032  
 Court of Appeals Case No. 2017-001817  
 ML File No.: 16-IM-085-AA

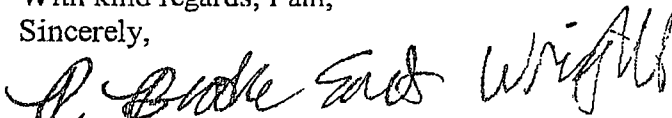
Dear Ms. Kitchings:

Enclosed herein for filing is the Respondent's Motion for Extension of Time to File Initial Brief. In addition to the Respondent's Motion for Extension of Time to File Initial Brief, please find enclosed copies of the following:

- (1) Proof of service of Respondent's Motion for Extension of Time to File Initial Brief upon the Appellant;
- (2) 6 Copies of the Respondent's Motion for Extension of Time to File Initial Brief; and
- (3) Requisite \$25.00 filing fee

We are respectfully requesting for clocked copies of Respondent's Motion for Extension of Time to File Initial Brief to be returned in the enclosed self-addressed stamped envelope. By copy of this letter and enclosed documents, I am notifying counsel for the Appellant of this communication with the Court.

With kind regards, I am,  
 Sincerely,

  
 P. Brooke Eaves Wright, Esquire

Enclosure

cc: Joseph D. Thompson, III, Esquire  
 Blake A. Hewitt, Esquire