

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Lawton McIntosh, Circuit Court Judge

Case No. 2016-CP-07-02253

RECEIVED
JAN 12 2018
SC Court of Appeals

Tonja McAllister,

Appellant,

v.

Susan Cato and CAPA of
Beaufort,

Respondents.

MOTION TO EXTEND TIME TO FILE BRIEF OF APPELLANT

Appellant Tonja McAllister respectfully moves this Court for an Order extending the time to serve and file the Brief of Appellant, and in support of this motion, Appellant respectfully shows the following:

1. Appellant received the transcript from the court reporter on November 6, 2017.
2. Shortly thereafter, the roof to our office was damaged in a storm, and we experienced substantial water damage to the interior of the building.
3. We recently returned to the office following the repairs, and business has finally returned to normal.
4. Therefore, Appellant respectfully moves this Court for an Order extending the time to serve and file the Brief of Appellant.

January 10, 2018

M. Brooks Derrick
M. Brooks Derrick (S.C. Bar 76330)
Law Office of M. Brooks Derrick, LLC
224 NE Main Street
Simpsonville, SC 29681
(864) 757-0757

Attorney for Appellant

Other Counsel of Record:

Jeffrey M. Bogdan
Barwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401
Attorney for Respondents

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PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Susan Cato and CAPA of Beaufort by depositing a copy of the Notice of Appeal with sufficient postage to their attorney of record on September 21, 2017.

January 10, 2018

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LAW OFFICE OF M. BROOKS DERRICK
ATTORNEY & COUNSELOR AT LAW

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January 10, 2018

Via Fax and U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
Fax: (803) 734-1839

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Re: *Tonja McAllister v. Susan Cato*
Appellate Case No.: 2017-002013

Dear Ms. Kitchings:

I have enclosed the Motion to Extend Time to File Brief of Appellant in the above-referenced matter. I have also enclosed a Proof of Service on the Respondent, six copies of the Motion, and a check in the amount of \$25.00 to cover the cost of filing the Motion.

Should you have any questions or require any additional information, please do not hesitate to contact me at (864) 757-0757 or via email (brooks@derricklawoffice.com).

With kind regards,

M. Brooks Derrick

M. Brooks Derrick

Enclosure(s): as stated

cc: *Jeffrey M. Bogdan (via Email and U.S. Mail)*

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224 NE MAIN ST
SIMPSONVILLE SC 29681-2318

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Ship To:

THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK, SOUTH CAROLINA COURT OF APPEALS
PO BOX 11629
COLUMBIA SC 29211-1629



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SC Court of Appeals

