

**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 16 2018
SC Court of Appeals

Tonja McAllister,

Appellant,

v.

Susan Cato and CAPA of Beaufort,

Respondents.

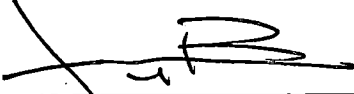
RETURN TO MOTION TO EXTEND TIME TO FILE BRIEF OF APPELLANT

Respondents, Susan Cato and CAPA of Beaufort, by and through their undersigned counsel, hereby submit this Return to Appellant's motion to extend the time to serve and file the "Brief of Appellant." Given the circumstances attested to by Appellant's counsel in the Motion, and despite the fact that Appellant's deadline to file and serve her Initial Brief has already passed, Respondents do not object the Court granting a reasonable extension of time for Appellant to file her Initial Brief. However, in her Motion, Appellant did not ask for an extension of any certain

time, instead asking for “an Order extending the time to serve and file the Brief of Appellant.” Respondents object to Appellant’s request for an open-ended, indefinite, and unlimited extension and request that, if the Court is so inclined to grant Appellant an extension, it provide a definite deadline for Appellant to comply with Rule 208, SCACR.

BARNWELL WHALEY PATTERSON & HELMS, LLC

By: _____


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Attorney for Respondents

JANUARY 11, 2018

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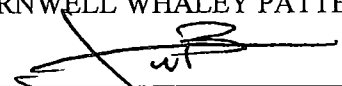
Susan Cato and CAPA of Beaufort,

Respondents.

PROOF OF SERVICE

I certify that I served the Return to Motion to Extend Time to File Brief of Appellant on Tonja McAllister by depositing a copy of the same with sufficient postage to her attorney of record on January 11, 2018.

BARNWELL WHALEY PATTERSON & HELMS, LLC



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Attorneys for Respondents



Jeffrey M. Bogdan, Esquire
JBogdan@barnwell-whaley.com

January 11, 2018

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

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SC Court of Appeals

Re: Tonja McAllister v. Susan Cato and CAPA of Beaufort
Appellate Case No.: 2017-002013

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of Respondent's Return to Motion to Extend Time to File Brief of Appellant with regard to the above matter. Upon filing the original, please return a clocked copy to me in the envelope enclosed for your convenience. Also enclosed is a Proof of Service on Appellant. Please do not hesitate to contact me with any questions or concerns.

Yours truly,

A handwritten signature in black ink, appearing to be "Jeffrey M. Bogdan", written over a horizontal line.

Jeffrey M. Bogdan

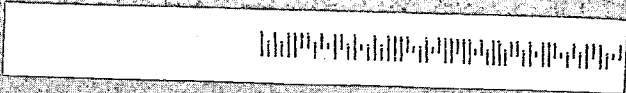
JMB/lap
Enclosures
cc: M. Brooks Derrick

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

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