

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

66570

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

Case No. 2012-212109

Susan Ann Bell Lynch,

Appellant/Respondent,

v.


Carolina Self Storage Centers,  
Inc.,

Respondent/Appellant.

MOTION FOR EXTENSION OF TIME

The Appellant/Respondent, Susan Ann Bell Lynch, by and through the undersigned attorney, hereby moves to be allowed to file and serve her Brief in Response to Respondent's/Appellant's Initial Brief out of time. The basis for this Motion is that a partner in the law firm for Counsel for Appellant/Respondent has been appointed by the South Carolina Supreme Court to serve as Trustee for the files of John Schurlknight and William Rivers. Due to the volume of files received, Counsel for Appellant/Respondent has had to assist in disbursing those files to the appropriate clients and speaking with the clients. As a result, Counsel for Appellant/Respondent would respectfully request an extension of time to file the Brief in Response to Respondent's/Appellant's Initial Brief.

December 10, 2012



Kevin M. Barth, SC Bar # 00559  
Ballenger, Barth, Hoefer & Lewis  
Post Office Box 107  
Florence, South Carolina 29503  
(843)662-6301  
Attorney for Appellant

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SC Court of Appeals

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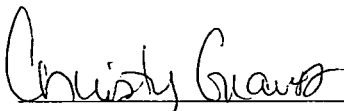
Respondent/Appellant.

CERTIFICATE OF MAILING

I, the undersigned, of the law offices of Ballenger, Barth, Hoefer & Lewis, do hereby certify that I have served all counsel in this action with a copy of the foregoing pleading by causing a copy of the same to be mailed by United States mail, postage prepaid, to the following address(es):

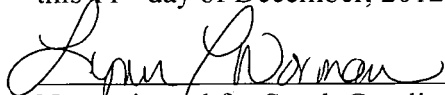
PLEADING: Motion for Extension of Time (for Response Brief)

COUNSEL SERVED: Kirby D. Shealy  
Post Office Box 2285  
Columbia, South Carolina 29202



Christy Graves  
Post Office Box 107  
Florence, South Carolina 29503  
(843) 662-6301

Sworn to and subscribed before me  
this 11<sup>th</sup> day of December, 2012



Notary in and for South Carolina

My Commission Expires: 5-27-18

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SC Court of Appeals

BALLENGER, BARTH, HOEFER & LEWIS L.L.P.

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December 11, 2012

SC Court Of Appeals  
Clerk of Court  
P.O. Box 11629  
Columbia, SC 29211

Re: Susan Ann Bell Lynch v. Carolina Self Storage Centers  
Appellate Case No. 2012-212109

Dear Sir/Madam:

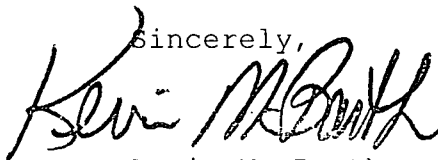
Enclosed herewith, please find my Motion for Extension of Time, with the appropriate filing fee, requesting that I be allowed an extension in which to file my Response Brief.

A partner in my firm has been appointed by the South Carolina Supreme Court as Trustee for the files of John Schurlknight and William Rivers. We have obtained hundreds of files from Schurlknight and Rivers, many of which are currently located at our office. There is also storage unit full of files from their office. All of the attorneys at our firm have been assisting in disbursing the files to the clients and speaking with clients to explain the situation. As a result, our entire office is swamped.

It is for this reason that I am requesting additional time to prepare my Response Brief.

With best regards, I am

Sincerely,



Kevin M. Barth

KMB/chg  
enclosure  
cc: Kirby D. Shealy, III

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