

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2015-CP-07-00913

RECEIVED
FEB 07 2018
SC Court of Appeals

In the matter of the Estate of John Joseph Manning, Jr.

Deanna Bushman, as Holder of Durable Power of Attorney for Sally Manning and as a Trustee of the Trust Agreement of Sally Manning Dated December 6, 2004 Respondent,

v.

The Estate of John J. Manning, Jr.; John J. Manning, III; Christopher Manning, and Linda Manning, Appellants.

MOTION FOR EXTENSION

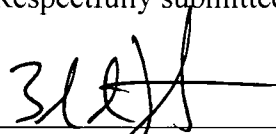
Pursuant to Rule 240, SCACR, respondent requests a 30-day extension of the deadline for filing her initial brief and designation of matter to be included in the record on appeal. The current deadline is February 12, 2018. This is the first request for an extension of this deadline.

/Signature page attached

✓

February 7, 2018

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. Hewitt", written over a horizontal line.

Blake A. Hewitt, # 73674

BLUESTEIN THOMPSON SULLIVAN, LLC

PO Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondent

February 7, 2018

VIA HAND DELIVERY

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

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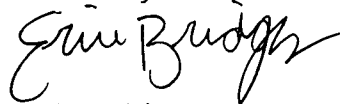
Re: Deanna Bushman v. Estate of John Joseph Manning, Jr.
Case Tracking No. 2017-002019

Dear Ms. Kitchings:

Attorney Blake Hewitt has been retained to assist as counsel for the Respondent in this case. Please find enclosed the original and one (1) copy of a request to notice his appearance. Also, please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have enclosed a proof of service of these documents on counsel for the Appellants and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges

Bluestein Thompson Sullivan, LLC

/emb

Enclosures

cc: J. Ashley Twombly, Esquire
Stephen P. Groves, Sr., Esquire
R. Bruce Wallace, Esquire

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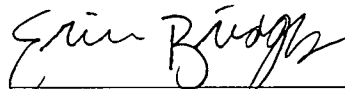
v.

The Estate of John J. Manning, Jr.; John J. Manning, III; Christopher Manning, and Linda Manning, Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellants with a copy of the *Notice of Appearance* and *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Stephen P. Groves, Sr.
R. Bruce Wallace
Nexsen Pruet, LLC
205 King Street, Suite 400
Charleston, SC 29401



Erin Bridges

February 7, 2018

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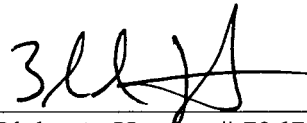
NOTICE OF APPEARANCE

Attorney Blake Hewitt respectfully requests that this Court note his appearance as additional counsel of record for Respondent. As the Court is aware, Respondent's trial counsel remains counsel of record. See Rule 264, SCACR; see also *Ex parte Strom*, 343 S.C. 257, 539 S.E.2d 699 (2000).

/Signature page attached

February 7, 2018

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Blake A. Hewitt', written over a horizontal line.

Blake A. Hewitt, # 73674
BLUESTEIN THOMPSON SULLIVAN, LLC
PO Box 7965
Columbia, South Carolina 29202
(803) 779-7599

Attorney for Respondent