

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Hon. Thomas A. Russo, Circuit Court Judge
(The Hon. Tamara C. Curry, Probate Court Judge)

Appellate Case No. 2017-001196
(Civil Action No. 2007-ES-10-1437)

RECEIVED
APR 09 2018
SC Court of Appeals

Jacquelin S. Bennett and Kathleen S. Turner as
Personal Representatives of the Estate of
Jacquelin K. Stevenson *Appellants.*

v.

Estate of James Kelly King and Genevieve S. Felder *Respondents.*

REQUEST FOR AN EXTENSION OF TIME

COMES NOW, the Appellants, Ms. Jacquelin S. Bennett and Ms. Kathleen S. Turner, by and through their undersigned counsel, respectfully moving before this honorable Court, pursuant to S. C. App. Ct. Rule 263(b) seeking an Order for an Extension of Time to serve and file the Appellants' Reply Brief. In support of same, Appellants would show this honorable Court the following particulars, to wit:

1. On or about April 6, 2018, Appellants received an electronic copy of the Respondent's Initial Brief and Certificate of Service.
2. The electronic copy indicates that Respondent served the original upon the Appellants via U.S. Mail that same date.

3. Pursuant to S.C. App. Ct. R. 208(a)(3), Appellants would therefore be required to serve any Reply Brief upon Respondent within ten (10) days from the date of service of Respondents' Initial Brief.
4. Accordingly, Appellants' Reply Brief would be due on Monday, April 16, 2018.
5. The undersigned Counsel for the Appellants has been on extended leave from the office in connection with the birth of his first son on March 20, 2018.
6. Although the Court does not allow the filing of Orders of Protection, the Appellants would ask this Court to take judicial notice that the undersigned is currently under protective Order through April 27, 2018 in every inferior court in which he is Counsel of Record.
7. In light of the same, Appellants would respectfully request an additional thirty (30) days to serve their Reply Brief.

WHEREFORE, the Appellants respectfully request this Honorable Court grant their Motion and issue an Order extending the time for Appellants to serve and file their Reply Brief to a date not later than May 16, 2018.

Respectfully submitted this 9th day of April, 2018.

By:

~~SLOTCHIVER~~ **SLOTCHIVER, LLP**



Andrew J. McCumber, Esquire

Daniel S. Slotchiver, Esquire

Stephen M. Slotchiver, Esquire

44 State Street

Charleston, South Carolina 29401

Telephone: (843) 577-6531

Facsimile: (83) 577-0261

COUNSEL FOR THE APPELLANTS

Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Hon. Thomas A. Russo, Circuit Court Judge
(The Hon. Tamara C. Curry, Probate Court Judge)

RECEIVED

APR 09 2018

SC Court of Appeals

Appellate Case No. 2017-001196
(Civil Action No. 2007-ES-10-1437)

Jacquelin S. Bennett and Kathleen S. Turner as
Personal Representatives of the Estate of
Jacquelin K. Stevenson *Appellants.*

v.

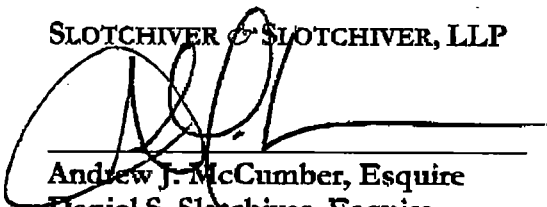
Estate of James Kelly King and Genevieve S. Felder *Respondents.*

PROOF OF SERVICE

I certify that I have served the **Request for Extension of Time** on the Respondents, Estate of James Kelly King and Genevieve S. Felder, by depositing a copy of same in the United States Mail, postage prepaid, on **April 9, 2018** addressed to their attorney of record, **George R. McElveen, Esquire**, of the law firm, **McElveen & McElveen**, located at **2229 Bull Street, Columbia, SC 29201**.

Respectfully submitted this **9th** day of **April, 2018**.

By: **SLOTCHIVER & SLOTCHIVER, LLP**



Andrew J. McCumber, Esquire
Daniel S. Slotchiver, Esquire
Stephen M. Slotchiver, Esquire
44 State Street
Charleston, SC 29401
Telephone: (843) 577-6531
Facsimile: (83) 577-0261

COUNSEL FOR THE APPELLANTS

SLOTCHIVER & SLOTCHIVER, L.L.P.

ATTORNEYS AT LAW

EST. 1959

IRVIN J. SLOTCHIVER
DANIEL S. SLOTCHIVER
STEPHEN M. SLOTCHIVER
ANDREW J. McCUMBER

44 STATE STREET
CHARLESTON, SC 29401-2810
TELEPHONE (843) 577-6531
FACSIMILE (843) 577-0261

April 9, 2018

VIA REGULAR MAIL & FACSIMILE:

RECEIVED

APR 09 2018

SC Court of Appeals

THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK, SOUTH CAROLINA COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
(803) 734-1839

**RE: JACQUELIN BENNETT & KATHLEEN TURNER vs. ESTATE OF JAMES
KING & GENEVIEVE FELDER**

Appellate Case No.: 2017-001196

Case No.: 2007-ES-10-1437

Dear Ms. Kitchings:

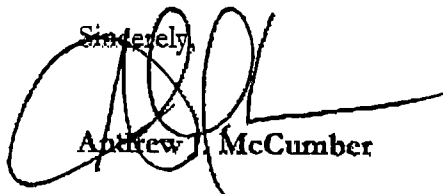
Enclosed for filing you will please find two (2) copies of Appellants' Motion for an Extension of Time to file the Reply Brief, along with two (2) copies of a Proof of Service for the same. Also enclosed you will please find one (1) check from my firm's escrow account in the amount of Twenty-Five (\$25.00) Dollars for the filing fee associated with the same.

If you would kindly file the original and return one clerk-stamped copy to my office using the self-addressed, postage-paid envelope I have also included, I would be most appreciative.

Please note that I have copied all counsel of record to this correspondence pursuant the South Carolina Appellate Court Rules.

I thank you in advance for your time and attention to this matter, please do not hesitate to contact me if you should have any questions regarding this correspondence or the matters addressed herein.

Sincerely,



Andrew J. McCumber

Enclosure(s) as stated.

cc: George R. McElveen, Esq., Attorney for Respondents (*via regular mail*)

SLOTCHIVER & SLOTCHIVER, LLP

DANIEL S. SLOTCHIVER, ESQUIRE
DAN@SLOTCHIVERLAW.COM
ANDREW J. MCCUMBER, ESQUIRE
ANDREW@SLOTCHIVERLAW.COM

44 STATE STREET
CHARLESTON, SC 29401
TELEPHONE: (843) 577-6531
FACSIMILE: (843) 577-0261

RECEIVED

FAX COVER SHEET

APR 09 2018

SC Court of Appeals

DATE: 04/09/18

TO: SC CT. OF APPEALS

FAX NO: (803) 734-1839

FROM: ANDREW J. MCCUMBER, ESQ.

RE: 2017 - 001196

PAGES: 5 (INCLUDING COVER SHEET)

SEE, ATTACHED.

PRIVILEGED AND CONFIDENTIAL: THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE AND ANY ATTACHMENTS IS ATTORNEY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.