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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2017-002618

RECEIVED
APR 19 2018
SC Court of Appeals

Harold Estes Blackwell, Jr..... Appellant,

v.

Miracle Hill Ministries, Inc., Anita Jane Miller
(aka Anita M. Blackwell), and Williams Fisk Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rules 240 and 263, SCACR, Respondent Miracle Hill Ministries, Inc. ("Miracle Hill") respectfully moves for an extension of sixty (60) days to file Miracle Hill's initial brief and designation of matter to be included in the record on appeal. According to Appellant's certificate of service filed with the Court on March 30, 2018, the initial brief and designation of matter to be included in the record on appeal was served on all respondents on March 19, 2018. Therefore, the current deadline for service and filing Miracle Hill's initial brief and designation of matter to be included in the record on appeal is currently Wednesday, April 18, 2018. A copy of the certificate of service is attached hereto as **Exhibit A**.

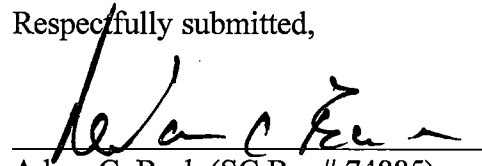
Miracle Hill respectfully requests this extension of time as it has filed a motion to dismiss the appeal which, if granted, would obviate Miracle Hill's need to prepare an initial brief. Furthermore, it appears that Appellant does not oppose an extension. See Ex. A ("Appellant has



no objection to any accommodation the Court might afford Respondents in the way of additional time to file their initial brief.”).

If the Court should grant Miracle Hill’s request for an extension of time, the new deadline for the applicable filings would be Monday, June 18, 2018. This is the first request for an extension filed by Miracle Hill. This requested extension is not intended to hinder, delay, or prejudice the judicial proceedings.

Respectfully submitted,



Adam C. Bach (SC Bar # 74885)
R. Hudson Smith (SC Bar # 101369)
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hsmith@etblawfirm.com

Attorneys for Respondent Miracle Hill
Ministries, Inc.

April 13, 2018

Greenville, South Carolina

Exhibit A

Harold (Hal) E. Blackwell, Jr.
315 Glendale Road
Union, South Carolina 29379
halblackwell@gmail.com

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MAR 30 2018
SC Court of Appeals

March 27, 2018

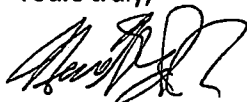
V. Claire Allen, Deputy Clerk
South Carolina Court of Appeals
Post Office Box 29211
Columbia, South Carolina 29211

Re: Harold E. Blackwell, Jr. v Miracle Hill Ministries, Inc. Appellate Case No. 2017-002618

Dear Ms. Allen,

Please find enclosed a corrected Certificate of Service on the Initial Brief submitted to the Court on March 19, 2018. The mailings of the copies to opposing counsel were discovered unmailed. The enclosed is to correct the record. Appellant has no objection to any accommodation the Court might afford Respondents in the way of additional time to file their initial brief.

Yours truly,



Hal Blackwell

Plaintiff, pro se

(864) 427-2174

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by:



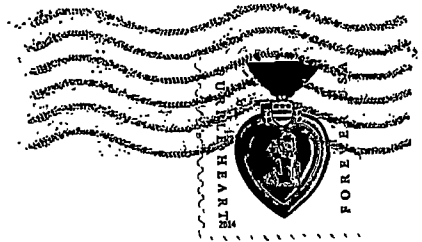
Harold Estes Blackwell, Jr.
Union, South Carolina 29379
(864) 303-7000

Union, South Carolina
March 27, 2018

Hal Blackwell
315 Glendale Road
Union, SC 29379

GREENVILLE SC 296

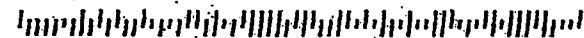
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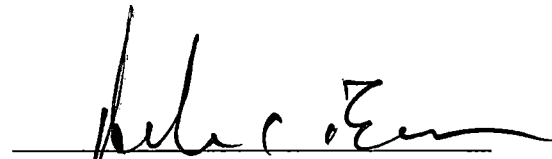
PROOF OF SERVICE

The undersigned certifies that he served Respondent Miracle Hill Ministries, Inc.'s Motion For Extension of Time to File Initial Brief and Designation of Matter by depositing a copy of same in the United States Mail, postage prepaid, on this the 13th day of April 2018, addressed to the self-represented Appellant and counsel for Respondents at the addresses listed below:

Harold Estes Blackwell, Jr.
315 Glendale Rd.
Union, SC 29379

Carrie Hailman O'Brien
Willson Jones Carter & Baxley, P.A.
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Charlotte, NC 28226

Melegia Lee Daniels, Jr.
M. Lee Daniels, Jr., P.C.
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Attorneys for Respondent Miracle Hill
Ministries, Inc.

April 13, 2018

Greenville, South Carolina



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Facsimile (864) 312-4191

April 13, 2018

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

*Re: Harold Estes Blackwell, Jr. vs. Miracle Hill Ministries, Inc., Anita Jane Miller (aka Anita M. Blackwell), and Williams Fisk
Appellate Case No.: 2017-002618*

Dear Ms. Kitchings:

Enclosed please find the originals and six copies (6) of Respondent Miracle Hill Ministries, Inc.'s motion for extension of time to file initial brief and designation of matter to be included in the record on appeal and motion to dismiss, along with our firm's check in the amount of \$50.00 for your filing fees and a proof of service for the same. We would appreciate your filing the originals and returning the clocked copies to us.

Please let us know if we may provide any additional information to you at this time.

Sincerely,

ELLER TONNSEN BACH, LLC


Adam C. Bach

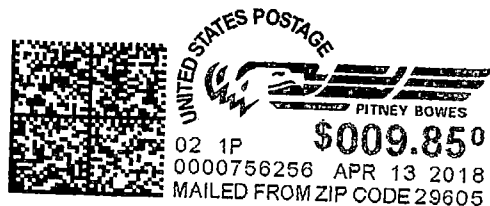
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SC Court of Appeals

ACB/amp
Enclosures

cc: Harold Estes Blackwell, Jr.
Carrie Hailman O'Brien
Melegia Lee Daniels, Jr.



 **ELLER TONNSEN BACH**
Attorneys at Law

1306 South Church Street • Greenville, SC 29605

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