

THE STATE OF SOUTH CAROLINA

In the Supreme Court

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FEB 13 2017

S.C. SUPREME COURT

Appellate Case No. 2016-000320
Circuit Case No. 2012-CP-10-1332

Betty Fisher, as Real Representative
for Alice Shaw-Baker.....Petitioner

v.

Bessie Huckabee, Kay Passailague Slade,
Sandra Byrd, and Peter Kouten, and Does 1 through 100, Defendants

Of whom Bessie Huckabee, Kay Passailague Slade, Sandra Byrd,
and Peter KoutenRespondents

CORRECTED MOTION FOR EXTENSION OF TIME TO FILE BRIEF BY
PETITIONER BETTY FISHER,
AS REAL REPRESENTATIVE OF ALICE SHAW-BAKER

JOHN HUGHES COOPER, ESQUIRE
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and

LISA FISHER, ESQUIRE
Pro Hac Vice
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(Attorneys for Petitioner)

COMES NOW Betty Fisher, as Real Representative for Alice Shaw Baker, Petitioner in the above matter, and, pursuant to Rules 240 and 242, SCACR, moves for a 14 day extension of time to file her Initial Brief of Petitioner and Appendix. (This motion supersedes the erroneous motion mailed on February 9, 2017 by FED EX.)

By Order entered January 13, 2017, the time for filing Petitioner's initial brief and Appendix is due on February 13, 2017. (See Rule 242(j), SCACR)

This case is a certiorari case, which means that this request is governed by the Court's *Order RE: Extensions in Cases Seeking A Petition for A Writ of Certiorari to Review a Decision for the South Carolina Court of Appeals*, SC. Sup. Ct. Order dated July 16, 2014.

Petitioner requests that she be allowed an additional 14 days to file her brief and Appendix, up and until February 27, 2017.

This is Petitioner's first extension request, and the grounds for this request are that Petitioner's counsel does not expect to be able to complete a satisfactory brief within the current deadline, which is Monday, February 13, 2017, due to a number of serious personal issues that have occurred during the time period prescribed for preparation of the brief. This includes the fact that Counsel Lisa Fisher was ill for over 10 days, and over the past 6 weeks, family illness has mandated her attention.

Despite these difficulties, Counsel Lisa Fisher believed that she would have sufficient time to finish the brief, however both of her computers became inoperable. She was forced to purchase a new computer, recreate her pleadings, and back up all other documents. Her other computer is out for repair.

Additionally, other probate matters have interfered with the proper drafting of this brief.

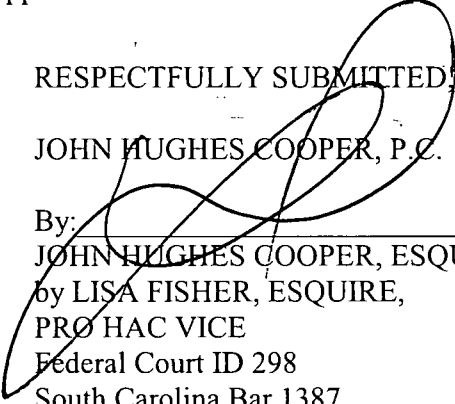
The drafting of this brief takes precedence and she wants to ensure that the brief is fully developed for this Court's consideration.

WHEREFORE, Petitioner prays for an Order granting a 14 day extension of time to file the Brief of Petitioner and Appendix.

February 10, 2017

RESPECTFULLY SUBMITTED

JOHN HUGHES COOPER, P.C.

By: 

JOHN HUGHES COOPER, ESQUIRE
by LISA FISHER, ESQUIRE,
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ATTORNEYS FOR PETITIONER

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PROOF OF SERVICE

I certify that I have served the **CORRECTED MOTION FOR EXTENSION OF TIME TO FILE BRIEF BY PETITIONER BETTY FISHER, AS REAL REPRESENTATIVE OF ALICE SHAW-BAKER** on the following counsel and parties by depositing a copy of it in the United States Mail, postage prepaid, on February 10, 2017, addressed as follows:

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(Attorney for Bessie Huckabee, Kay Passailague Slade, Sandra Byrd)

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(Attorney Pro Se and Bessie Huckabee, Kay Passailague Slade, Sandra Byrd)

February 10, 2017

RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By: 

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~~by LISA FISHER, ESQUIRE,~~
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