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The State of South Carolina
In The Court of Appeals

Appeal from Charleston County
Hon. Deadre Jefferson, Circuit Court Judge

Case No. 2014-CP-10-4591
Appeal 2017-002392

RECEIVED
JUN 29 2018
SC Court of Appeals

Jane Doe 202,

Appellant

v.

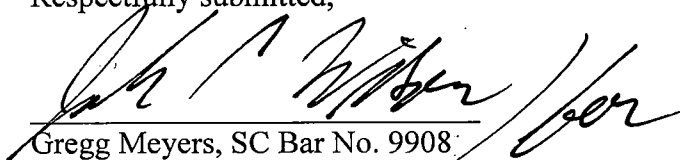
City of North Charleston,
Leigh Anne McGowan, individually,
Charles Francis Wholleb, individually,
Anthony M. Doxey, individually

Respondents

Motion to Extend Time

The appellant moves to extend by 14 days the time to serve the Record on Appeal, presently due July 9. Appellant's counsel is out of state attending to post-surgery medical follow-up for both his wife and himself, as well as vacationing with family, and should return to Charleston July 10.

Respectfully submitted,



Gregg Meyers, SC Bar No. 9908
Of Counsel, Pierce Sloan LLC
321 East Bay Street
Charleston SC 29401
843-722-7733, 843-722-7732 facsimile
greggmeyers@piercesloan.com

Other counsel of Record:

Chris Dorsel

Senn Legal, LLC

3 Wesley Drive

Charleston SC 29407

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Proof of Service

I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

Motion to Extend Time

By placing a copy of the documents in the United States mail, first-class postage pre-paid,
addressed to:

Chris Dorsel
Senn Legal, LLC
3 Wesley Drive
Charleston SC 29407

Done June 27, 2018.


Gregg Meyers
Of Counsel

Pierce Sloan LLC
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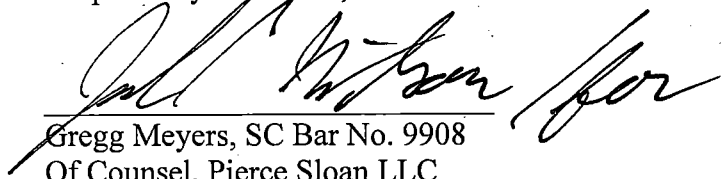
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Suggestion of Death on the Record

Pursuant to SCRCP 25(a)(2) and SCACR 265, the appellant gives notice of the death of Jane Doe 202 on June 14, 2018. Due to her Alzheimer's dementia, the appellant has been incompetent to manage her own affairs since before this action commenced, and the case was initiated by those who held her power of attorney, one of whom is presently her Guardian. Because her dementia preceded suit, we do not believe any substitution of parties is necessary, although if the Court desires, we are happy to substitute The Estate of Jane Doe 202 as the appellant. The cause of action survives death. E.g., *Moore v. City of Columbia*, 326 S.E.2d 157 (S.C App. 1985) (1983 claim survived death).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregg Meyers", is written over a horizontal line.

Gregg Meyers, SC Bar No. 9908
Of Counsel, Pierce Sloan LLC
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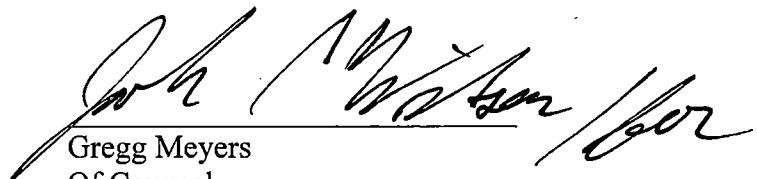
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Suggestion of Death on the Record

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addressed to:

Chris Dorsel
Senn Legal, LLC
3 Wesley Drive
Charleston SC 29407

Done June 27, 2018.



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◆ CERTIFIED SC CIRCUIT
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† MEMBER SC, FL & GA BAR
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■ MEMBER SC & VA BAR

Direct Dial: (843) 725-7750
Email: greggmeyer@phswlaw.com

June 27, 2018

Jenny Abbott Kitchings, Clerk of Court
The South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Jane Doe 202 v. North Charleston
Appellate Case No. 2017-002392
File No. GM0023

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Dear Ms. Kitchings:

Enclosed please find an original and six copies of the Motion to Extend Time to Serve the Record on Appeal with Proof of Service and the original Suggestion of Death on the Record with Proof of Service.

Thank you for your assistance in this matter.

With kind regards,

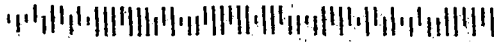
Sincerely,

Gregg Meyers

Gregg E. Meyers

cc: Christopher Dorsel, Esquire (w/ encl.)

✓



PIERCE | SLOAN

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