

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**APPEAL FROM FLORENCE COUNTY
CIRCUIT COURT**

Thomas A. Russo, Circuit Court Judge

APPELLATE CASE NO. 2018-001144

RECEIVED

SEP 26 2018

SC Court of Appeals

**IN THE MATTER OF:
THOMAS G. MOORE (Decedent)**

Michael Dennis Moore.....Appellant,

v.

Thomas Paul Moore, Francine Laura Lawhon,
Linda Kaye Moore, Phillip Frederick Moore.....Respondents.

MOTION FOR EXTENSION OF TIME

Norwood DuRant, Jr., Esquire
Law Offices of N. David DuRant
P.O. Box 14722
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Phone: (843) 650-7800
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Attorney for Respondent

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MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF TIME

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Attorney for Respondent

The Appellant respectfully requests this Court for a 30 day extension to file its Initial Brief and Designation of the Matter to be Included on the Record. This motion is made in accordance to South Carolina Appellate Court Rule 240.

This request is made due to the weather conditions that are currently plaguing Horry and Georgetown counties, the county in which the Appellants' attorney's office is located. Earlier this month, there was a mandatory evacuation issued due to Hurricane Florence. Severe flooding is and will be taking place over the next week, which has and will force road closures. Counsel for the Appellant is not certain the postal services will be able to make deliveries in the required time for filing the above documents.

For the above reasons, the Appellant requests this thirty (30) day extension to file his Initial Brief and Designation of the Matter to be Included on the Record. Due to the unexpected nature of this motion, caused by uncontrollable weather conditions, the Appellant would request this court to allow a Stay of the Time limits until an extension is either granted or denied.

Dated at Surfside Beach, South Carolina, this 25th day of September, 2018.

Norwood D. DuRant, Jr., Esquire (SCB# 101723)
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ATTORNEY FOR Respondents

By: 

Norwood D. DuRant, Jr. Esquire

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM FLORENCE COUNTY
Court of Common Pleas**

The Honorable Thomas A. Russo, Circuit Court Judge

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APPELLATE CASE NO. 2018-001144

SEP 26 2018

SC Court of Appeals

IN THE MATTER OF:

THOMAS G. MOORE (Decedent)

Michael Dennis Moore.....Appellant,

v.


Thomas Paul Moore, Francine Laura Lawhon,

Linda Kaye Moore, Phillip Frederick Moore.....Respondents.

CERTIFICATE OF COUNSEL

The undersigned certifies that this Notice of Appeal complies with Rule 211(b) of the South Carolina Appellate Court Rules.

September 25, 2018


Norwood DuRant, Jr., Esquire
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Phone: 843-650-7800
Fax: 843-650-8090
Attorney for Appellant

Other Parties of Record:

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Turner Padget
P.O. Box 5478
Florence, SC 29502
Attorney for Defendant Thomas Paul Moore

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2005 Third Loop Rd.
Florence, SC 29501

Linda K. Moore
1454 Golf Terrace Blvd.
Florence, SC 29502

Phillip F. Moore
3401 Chantz Ct.
Florence, SC 29501

LAW OFFICES OF N. DAVID DuRANT AND ASSOCIATES, P.A.
ATTORNEYS AT LAWN. DAVID DuRANT, SR.
NORWOOD D. DuRANT, JR.

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PROBATE EMAIL: cjudge@lawofficesofdurant.com (Christina)
REAL ESTATE EMAIL: durantre@lawofficesofdurant.com (Stacy)

September 25, 2018

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SC Court of Appeals

Via UPS Next Day DeliveryThe Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201RE: Michael Dennis Moore v. Thomas Paul Moore, et al.
APPELLATE CASE NO. 2018-001144

Dear Ms. Kitchings:

Please allow this letter serve as the Appellant's written request for a thirty (30) day extension in filing his Initial Brief and Designation of the Matter to be included on the Record. The due date for filing these two items is October 4, 2018, which is 30 days from September 4, 2018, the date in which the transcript was delivered to the Appellant.

The Appellant respectfully requests this extension due to the weather conditions that are currently plaguing Horry and Georgetown counties, the county in which the Appellants' attorney's office is located. Earlier this month, there was a Mandatory evacuation issued due to Hurricane Florence. Severe flooding is and will be taking place over the next week, which have and will force road closures.

Enclosed for filing are an original and six (6) copies of the Appellant's Motion for Extension of Time in the above case. Also enclosed are the following:

1. Affidavit of Service of the Motion for an Extension of Time of the on the Respondents;
2. A Memorandum in Support of the Motion;
3. Certificate of Service;
4. Certificate of Counsel; and
5. The required filing fee of \$25.00.

Thank you for your assistance in this matter and in the event you require any further documentation, please do not hesitate to contact our office.

In kind regards, I remain

Sincerely yours,



Norwood D. DuRant, Jr.

NDDjx/jlj

Enclosures

cc: C. Pierce Campbell, Esquire, Attorney for Respondent Thomas Paul Moore
Francine L. Lawhon
Linda K. Moore
Phillip F. Moore

LAW OFFICES OF N. DAVID DuRANT AND ASSOCIATES, P.A.
ATTORNEYS AT LAW

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SC Court of Appeals

DATE: 9/25/2018

TO: S.C. Court of Appeals

CC. Pierce Campbell Turner Pudgett

TELEPHONE: 843-650-7800

TELEFAX:

FROM: Law Offices of N. David Durant

SUBJECT: Appellate Case No. 2018-001144

Motion for Extension of Time Due to Flooding
TOTAL PAGES:

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SPECIAL REMARKS:

→ Motion is to follow in the mail.

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TELEFAX TRANSMITTED BY: Christina B. Judge, Paralegal

PLEASE CALL (843) 650-7800 TO CONFIRM RECEIPT OF THIS FACSIMILE. THANK YOU.

