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The State of South Carolina
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Appellant Case No: 2018-001184

Navy Federal Credit Union

Respondent,

v.

William T. Simmons, III,
Laura Ferguson, Ford Motor
Credit Company LLC
Of whom Laura Ferguson is the Appellant.

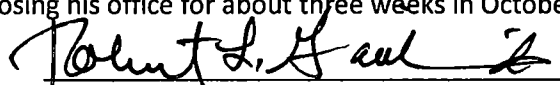
Defendants,

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Motion for Extension of Time to Serve Initial Brief

Now comes the Attorney for the Appellant moving for an extension of time of sixty days to serve the Initial Brief on the grounds that the attorney's daughter was tragically killed in an automobile accident in Mississippi on October 6, 2018 which necessitated closing his office for about three weeks in October.

November 8, 2018



Robert L. Gailliard, Attorney for Laura Ferguson
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Attorney for Appellant

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Kelley Y. Woody
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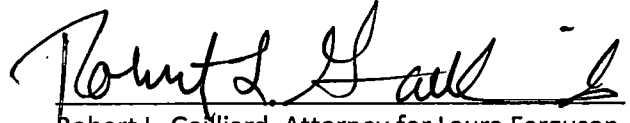
Proof of Service

I certify that I have served the Notice of Motion for Extension of Time to Serve Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, on November 8, 2018 addressed to its attorney of record, John B Kelchner P.O. Box 8237 Columbia, SC 294202 and Kelley Y. Woody. P.O. Box 6432 Columbia, SC 29260.

November 8, 2018

Other Counsel of Record:

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November 8, 2018

V. Claire Allen, Deputy Clerk
Court of Appeals
P.O. Box 11629
Columbia, SC 29211

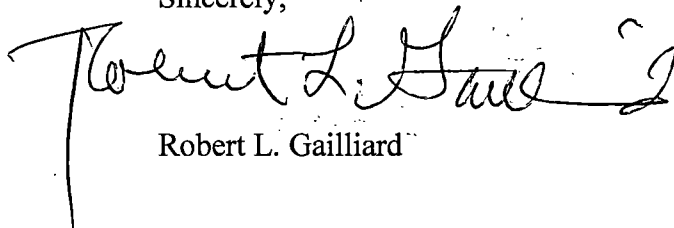
Re: Laura Ferguson Appeal
Appellate Case No: 2018-001184

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Dear Ms. Allen,

Enclosed please find my Motion for An Extension of Time to Serve the Initial Brief in the above-entitled case along with my Proof of Service showing that I have served the Motion on all counsel of record. Please file and return the Order of the Court to me in the envelope provided. I have enclosed my office check for \$50.00 to cover the filing fee.

Sincerely,



Robert L. Gailliard

Copy: Jennifer Ferguson
John B. Kelchner, ESQ.
Kelley Y. Woody, ESQ.

✓

Robert L. Gailliard
Attorney at Law
1072 King St. Ste. E
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