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THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

2018-001089

**RECEIVED**

DEC 03 2018

SC Court of Appeals

Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons, Plaintiffs,

Of whom Gwendolyn Brown, Deville Kiez Simmons, and Haroldett Uneke Simmons are.....Appellants,

vs.

Housing Authority of the City of Charleston, South Carolina.....Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF  
AND DESIGNATION OF MATTER

The Respondent, Housing Authority of the City of Charleston, South Carolina, respectfully requests an extension of time to file the Respondent's Initial Brief and Designation of Matter. Counsel for the Respondent was served with the Appellants' Initial Brief and Designation of Matter on November 30, 2018, making the Respondent's Initial Brief and Designation of Matter due on December 30, 2018. If the motion is granted, the Initial Brief would be due thirty (30) days from the original due date, which would be January 29, 2019.

The undersigned is currently preparing for Oral Arguments scheduled in the Fourth Circuit Court of Appeals in Richmond, VA and has long standing

vacation plans at the end of the month for the holidays. Therefore, the undersigned would respectfully request additional time to file the Respondent's Initial Brief and Designation of Matter.

Respectfully submitted,

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr

Post Office Box 40

Beaufort, SC 29901-0040

(843) 522-2400

Attorney for Housing Authority of the  
City of Charleston

Bar No: 16927

Beaufort, South Carolina

November 30, 2018

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Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp;  
Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons,  
Plaintiffs,

Of whom Gwendolyn Brown, Deville Kiez Simmons, and Haroldett Uneke  
Simmons are.....Appellants,

vs.

Housing Authority of the City of Charleston, South Carolina.....Respondent.

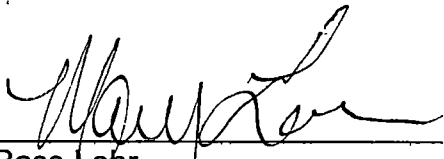
PROOF OF SERVICE

The undersigned counsel hereby certifies that she has served the  
foregoing Motion for Extension of Time to File Respondent's Initial Brief and  
Designation of Matter upon all counsel of record by affixing same with proper  
postage and placing same with the United States Postal Service on 30th day of  
November, 2018 addressed to the following:

J. Seth Whipper, Esquire  
Whipper Law Firm  
Post Office Box 70070  
North Charleston, SC 29415

{Signature Page Follows}

HOWELL, GIBSON & HUGHES, P.A.

By:   
Mary Bass Lohr  
Post Office Box 40  
Beaufort, SC 29901-0040  
(843) 522-2400  
Attorney for Housing Authority of the  
City of Charleston

Beaufort, South Carolina

November 30, 2018

HOWELL, GIBSON AND HUGHES, P.A.  
ATTORNEYS AT LAW

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NATHAN E. AKERS

JAMES S. GIBSON, JR \*  
Of Counsel

\* Certified Mediator

November 30, 2018

Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**  
DEC 03 2018  
SC Court of Appeals

Re: Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons vs. Housing Authority of the City of Charleston, South Carolina  
2014-CP-10-043  
Civil Action No.: 2018-001089  
Our File No: 11845 MBL

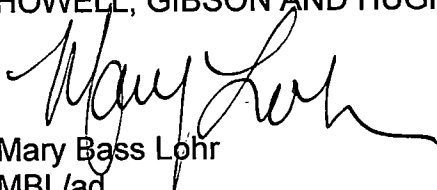
Dear Ms. Kitchings:

Please find enclosed herewith for filing the original and six (6) copies of a Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter with regard to the above referenced matter. I have also enclosed the firm's check in the amount of \$50.00 representing the filing fee. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.

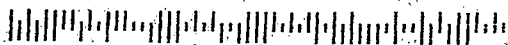


Mary Bass Lohr  
MBL/ad

Enclosure

cc: J. Seth Whipper

✓



HOWELL, GIBSON & HUGHES, P.A.  
POST OFFICE BOX 40  
BEAUFORT, SC 29906  
MBL

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DEC 03 2010

SC Court of Appeals

Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211