

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS

Honorable Daniel E. Van Slambrook, Circuit Court Judge

CASE NO. 2004-CP-08-1855

RECEIVED
DEC 07 2018
SC Court of Appeals

Ronald E. Price and Diana R. B. Price Respondents-Appellees

v.

Belinda Fox and Gerry Fox Petitioners-Appellants

NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME


For good cause shown, Defendants, Belinda Fox and Gerry Fox, by and through their attorney, Paul B. Ferrara, III hereby would respectfully ask this court for a thirty (30) day extension of time, making the deadline January 9, 2019, to file the initial brief and designation of matter to be included in the record on appeal based upon good cause. Appellants' counsel was preparing for a jury trial and post trial matters in the case before Honorable Deidre Jefferson in Berkeley county in November. As a result, counsel requests additional time to file its initial brief and designation of matter to be included in the record on appeal. This matter was filed with the court on November 9, 2018 and Appellant is in receipt of the trial transcript. Therefore, the original deadline for filing the Appellants' initial brief and designation of matter to be included on appeal is December 9, 2018.

Attorney Paul B. Ferrara, III, has contacted the Respondents attorneys, Derrick Jackson and Carl Hubbard. Both have consented to an extension of time.

WHEREFORE, Appellants, Belinda Fox and Gerry Fox respectfully asks this court for an extension of time for thirty (30) days, thereby, making the initial brief and designation of matter to be included on appeal due on January 9, 2019.

FERRARA LAW FIRM, PLLC

December 6, 2018



Paul B. Ferrara, III
Attorney for Appellants
2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511 / (843) 569-5411 fax
SC Bar No. 70511

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PROOF OF SERVICE

I certify that I have served one (1) copy of the Motion for Extension of Time by depositing a copy of it in the United States Mail, postage prepaid, on December 6, 2018, addressed to:

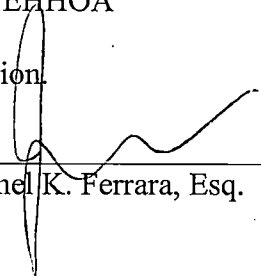
J. Derrick Jackson, Esq.
Tobias G. Ward, Jr, P.A.
P.O. Box 50124
Columbia, SC 29250
Attorney for Ronald E. Price and Diana R. Price

and

Carl B. Hubbard, Esq.
2201 Middle Street, Box 15
Sullivan's Island, SC 29482
Attorney for Eagle Harbor, Inc., Heritage Classic Homes, Inc.
and the Eagle Harbor Phase II Development Partnership through
Danny L. Gilbert, a partner, and EHHOA

3. That she is not a party to this action.

December 6, 2018



Janel K. Ferrara, Esq.

Ferrara Law Firm, PLLC

2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511 / Fax (843) 569-5411

Paul B. Ferrara, III*
Janel K. Ferrara*
Nadia S. Baig

*(also Admitted in N.C.)

December 6, 2018

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SC Court of Appeals

VIA FEDEX

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Ronald E. Price and Diana R.B. Price v. Belinda Fox and Gerry Fox
Court of Common Pleas Case No.: 2004-CP-08-1855
Our File No.: 15-614

Dear Ms. Kitchings:

Please find enclosed a motion for extension of time along with a check for the motion fee. Please return a clocked copy of this letter in the self-addressed, stamped envelope which is enclosed.

If you have any questions, please feel free to contact our office.

Sincerely,



Paul B. Ferrara, III
FERRARA LAW FIRM, PLLC

Enclosures as stated

✓

ORIGIN ID:CHSA (843) 569-5511
PAUL FERRARA III
2300 OTRANTO ROAD
NORTH CHARLESTON, SC 29406
UNITED STATES US

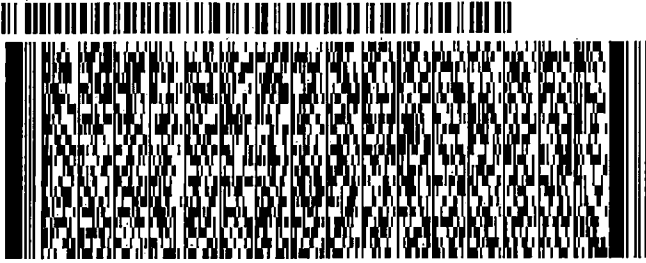
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SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

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COLUMBIA SC 29201

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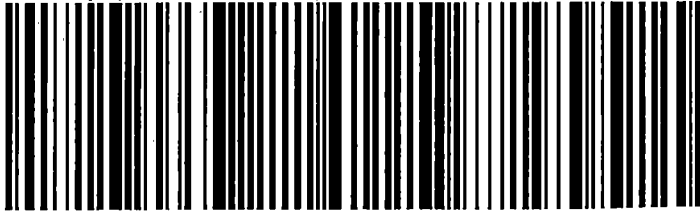
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SC Court of Appeals

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