

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

JAN 28 2019

SC Court of Appeals

2018-001089

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.

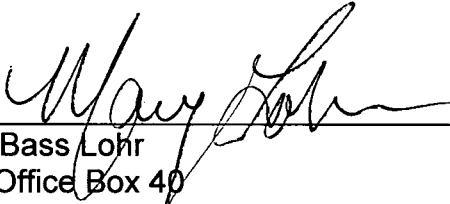
MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF
AND DESIGNATION OF MATTER

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. Respondent's Initial Brief and Designation of Matter is currently due on January 29, 2019. Counsel for the Respondent would respectfully request an additional fifteen (15) days to file the Initial Brief and Designation of Matter on behalf of Housing Authority of the City of Charleston, South Carolina. If the motion is granted, the Initial Brief and Designation of Matter would be due on February 13, 2019.

The undersigned has had several depositions and a trial and would respectfully request additional time to file the Respondent's Initial Brief and Designation of Matter. This is the undersigned's second request for an extension.

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

January 25, 2019

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY
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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.

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PROOF OF SERVICE

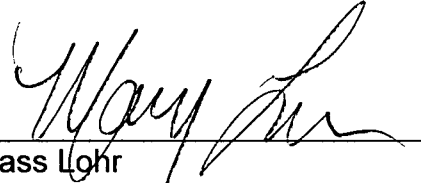
The undersigned counsel hereby certifies that she has served the foregoing Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on 25 day of January, 2019 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: _____

A handwritten signature in cursive script, appearing to read "Mary Bass Lohr", written over a horizontal line.

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

January 25, 2019

HOWELL, GIBSON AND HUGHES, P.A.
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WILLIAM H. COX, III
NATHAN E. AKERS

JAMES S. GIBSON, JR *
Of Counsel

* Certified Mediator

January 25, 2019

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

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

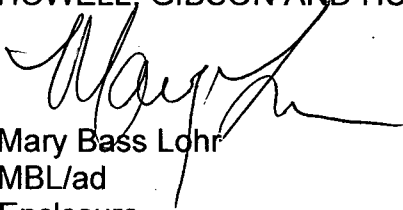
Dear Ms. Kitchings:

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

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SC Court of Appeals

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HOWELL, GIBSON & HUGHES, P.A.
POST OFFICE BOX 40
BEAUFORT, SC 29906
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Hon. Jenny Abbott Kitchings
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South Carolina Court of Appeals
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