

88969

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

FEB 05 2019

SC Court of Appeals

The Honorable Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2018-001372

Common Pleas Case No: 2016-CP-18-2123

Mary Greene-Mackey.....Appellant,

vs.

David Bevins.....Respondent.

**MOTION FOR EXTENSION OF TIME**

Respondent moves this Honorable Court for an extension of time within which to prepare the Initial Brief and Designations in this appeal. In support of his Motion, Respondent will show:

1. The Notice of Appeal was timely filed and served in this matter on July 18, 2018.
2. The transcript of the hearing in this matter has been requested and was supplied on or about September 26, 2018.
3. The Respondent's Initial Brief and Designation of Matter was initially due on January 11, 2019. The Respondent was previously granted an extension by Order filed on January 23, 2019,

therefore making the due date on or before February 8, 2019. This was Respondent's first request for an extension.

4. Due to the press of other litigational matters, Respondent needs additional time to prepare and file his Initial Brief and Designations.

5. Counsel for the Appellant has consented to an additional 30-day extension.

WHEREFORE, having fully set forth the grounds for the Motion, Respondent moves for an Order granting an extension of time of thirty (30) days for the preparation and filing of the Respondent's Initial Brief and Designations, so that such pleadings are due to be filed and served no later than March 10, 2019.

February 1, 2019



---

Harold A. Oberman  
S.C. Bar No. 15254  
Marvin I. Oberman  
S.C. Bar No. 42567  
OBERMAN & OBERMAN, LLC  
60 Markfield Drive, Suite 2  
Charleston, SC 29407  
(843) 577-7010  
Attorney for Respondent

Other Counsel of Record:

Eduardo Kelvin Curry, Esquire  
The Curry Law Firm  
Attorneys at Law  
P. O. Box 42270  
N. Charleston, SC 29423

Attorneys for Appellant

f:\ob\bevins-mackey314.005\appeal\pleading\extension.mot

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

FEB 05 2019

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2018-001372

Common Pleas Case No: 2016-CP-18-2123

Mary Greene-Mackey.....Appellant,

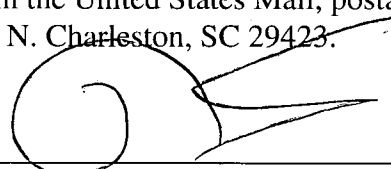
vs.

David Bevins.....Respondent.

**PROOF OF SERVICE**

I certify that on the 1<sup>st</sup> day of February, 2019, I served the foregoing Motion for Extension of Time on opposing counsel of record by depositing in the United States Mail, postage prepaid, addressed to Eduardo Kelvin Curry, P. O. Box 42270, N. Charleston, SC 29423.

February 1, 2019



---

Harold A. Oberman  
S.C. Bar No. 15254  
OBERMAN & OBERMAN, LLC  
60 Markfield Drive, Suite 2  
Charleston, SC 29407  
(843) 577-7010  
Attorneys for Respondent

**OBERMAN & OBERMAN, LLC**  
ATTORNEYS AND COUNSELORS AT LAW  
60 MARKFIELD DRIVE, SUITE 2  
CHARLESTON, SOUTH CAROLINA 29407

MARVIN I. OBERMAN  
HAROLD A. OBERMAN

TELEPHONE (843) 577-7010  
FACSIMILE (843) 722-7359  
EMAIL: obermanlaw@bellsouth.net

February 1, 2019

**RECEIVED**

FEB 05 2019

**SC Court of Appeals**

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

RE: Mary Greene Mackey v. David Bevins  
Case No. 2016-CP-18-2123  
Appellant Case No. 2018-001372

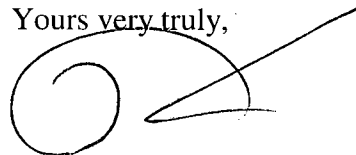
Dear Ms. Allen:

I enclose the original and six (6) copies of a Motion for a 30-day extension of time to file Respondent's Initial Brief and Designation of Matter in the above-captioned matter. Counsel for the Appellant has agreed to the extension. Our check in the amount of \$50.00 for the filing fee is also enclosed. My Proof of Service is attached to this Motion.

I also enclose an additional copy of the Motion together with a stamped, self-addressed envelope. Would you be so kind as to have a member of your staff file this Motion and return a copy to me showing the date and time of filing.

With warmest personal regards, I remain

Yours very truly,



Harold A. Oberman

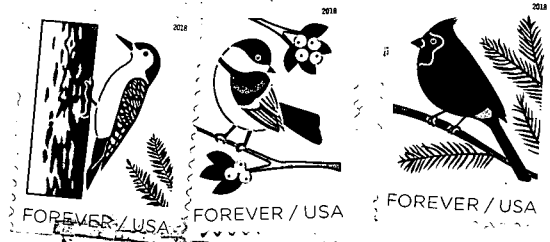
HAO/shb  
Enclosures

cc: Eduardo K. Curry, Esquire (w/enclosures)

f:\ob\bevins-mackey314.005\appeal\tr\allen.b01

**OBERMAN & OBERMAN**

ATTORNEYS AND COUNSELLORS AT LAW  
60 MARKFIELD DRIVE, SUITE 2  
CHARLESTON, SOUTH CAROLINA 29407



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

POSTED  
FEB 09 2019  
SC Court of Appeals