

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2018-002231

Albert H. Dallas, and A. Stephenson Wallace,
Chapter 7 Trustee,Appellant

v.

Russell Bauknight as Special Administrator of the
Estate of James Brown,Respondent

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FEB 11 2019

SC Court of Appeals

MOTION FOR EXTENSION OF TIME

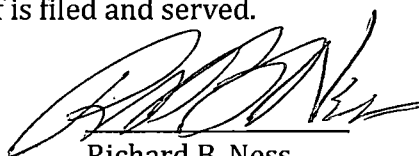
On behalf of the Appellant, the undersigned requests an extension of time for Appellant to file his Initial Brief. A Notice of Appeal in this action was filed on December 18, 2018. At that time, a transcript was ordered, from the summary judgment motion before the trial court, which precipitated the Order granting Partial Summary Judgment from which the appeal is taken. The transcript was delivered to the Appellant by U. S. Mail on January 28, 2019. Pursuant to Rule

208(a)(1), SCACR, this means that the Initial Brief is currently due Thursday, February 27, 2019.

This case has a lengthy procedural history that requires a detailed summary, the preparation of which is time-consuming. The Appellant requests thirty (30) days additional time to file his Initial Brief, to provide ample time to properly review and analyze the records, briefs, exhibits, and procedural history of this case, which was begun with a creditor claim filed in the Estate of James Brown (Aiken County Probate Court 2007-ES-02-0056) on September 7, 2007.

This motion will not prejudice the Respondent in anyway, as his time to respond will not be triggered until the Initial Brief is filed and served.

February 8, 2019



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CERTIFICATE OF SERVICE

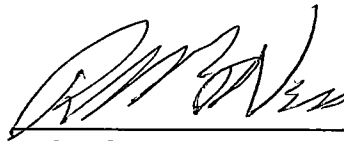
I, the undersigned, do hereby certify, that my agent has served the foregoing Notice of Motion and Motion for an Extension of Time, upon the persons below via US Mail:

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1916-1991

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SC Court of Appeals

Honorable Jenny Abbot Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: *Albert H. Dallas, and A. Stephenson Wallace, Chapter 7 Trustee, v.
Russell Bauknight as Special Administrator of the Estate of James Brown,*
Case Number: Case No. 2018-002231

Dear Ms. Kitchings:

Please find enclosed an original and one copy of a Motion for an Extension of Time to File Initial Appellate Briefs in the above-referenced action, along with my firm's check for \$50.00. Please file the original and return a clocked copy to me for our file.

Please let me know if you need anything else.

Sincerely,



Richard B. Ness

RBN: adh

CC: Eugene C. Covington, Jr.
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