

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No. 2018-CP-12-0334
Appellate Case No 2018-001991

RECEIVED

FEB 28 2019

SC Court of Appeals

Angela H. BainAppellant,

v.

Denise C. Lawson and Kenneth L. ChildsRespondent.

**RESPONDENT, KENNETH L. CHILDS' MOTION FOR EXTENSION
OF TIME WITHIN WHICH TO FILE AND SERVE THE
INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD**

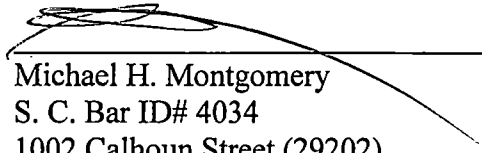
YOU WILL PLEASE TAKE NOTICE, that pursuant to Rules 208, 209, and 240 of the South Carolina Appellate Court Rules, the Respondent, Kenneth L. Childs, by and through his undersigned attorney, moves to extend the due date in which to file and serve his Initial Brief and Designation of Matter from March 11, 2019 to April 10, 2019. This motion is the Respondent, Kenneth L. Childs', first request for an extension.

The undersigned is informed and believes that Respondent's Counsel will complete and file the Brief and Designation of Matter within the additional thirty days requested and that the Appellant will not be prejudiced by the extension sought by this Motion.

As indicated above, this is the first request for an extension of time by the Respondent Kenneth L. Childs. Counsel for Kenneth Childs has communicated with Shannon M. Polvi, Counsel for Angela H. Bain who consents to the Court granting the requested extension.

Respectfully Submitted,

MONTGOMERY WILLARD, LLC



Michael H. Montgomery
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Post Office Box 11886
Columbia, South Carolina 29211-1886
(803) 779-3500
Facsimile (803) 799-2755
*ATTORNEYS FOR THE RESPONDENT
KENNETH L. CHILDS*

February 28, 2019
Columbia, South Carolina

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PROOF OF SERVICE

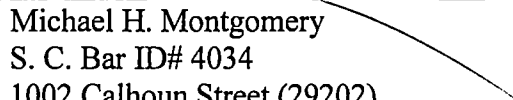
I certify that I have served the **MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE AND SERVE THE INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD** on the Appellant, by email and by depositing a copy of each in the United States Mail, postage prepaid, on the 28th day of February 2019, addressed to their attorney of record:

*J. Lewis Cromer
Shannon M. Polvi
1418 Laurel Street, Ste. A
Columbia, SC 29211*

And

*Eugene H. Matthews
Richardson Plowden and Robinson
PO Drawer 7788
Columbia, SC 29202
gmatthews@RichardPlowden.com*

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*ATTORNEYS FOR THE RESPONDENT
KENNETH CHILDS*

February 28, 2019
Columbia, South Carolina

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SC Court of Appeals

Cristy M. Bradley

From: Shannon Polvi <Shannon@CBPHlaw.com>
Sent: Thursday, February 28, 2019 10:28 AM
To: Michael H. Montgomery
Cc: Cristy M. Bradley
Subject: RE: Motion for Extension of time to file Initial Brief and Designation of Matter 02282019.docx

Dear Mike,

I consent to the requested extension.

Sincerely,
Shannon

Shannon Polvi
CROMER BABB PORTER & HICKS, LLC

1418 Laurel St., Suite A (29201) | P.O. Box 11675 | Columbia, SC 29211
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From: Michael H. Montgomery <mhm@montgomerywillard.com>
Sent: Thursday, February 28, 2019 10:14 AM
To: Shannon Polvi <Shannon@CBPHlaw.com>
Cc: Cristy M. Bradley <cbradley@montgomerywillard.com>
Subject: Motion for Extension of time to file Initial Brief and Designation of Matter 02282019.docx

Shannon:

Per our conversation this morning, attached please find my proposed motion to extend our time to file and serve our initial brief and designation matter. We propose to move the deadline from March 11, 2019 to April 10, 2019 (thirty days). I appreciate your confirming your consent via return e-mail.

Thanks for your courtesy and consideration in this matter. Have a great day.

Mike



MICHAEL H. MONTGOMERY

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MONTGOMERY WILLARD, LLC

FEB 28 2008

10:00 AM

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February 28, 2019

Via Hand Delivery

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

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SC Court of Appeals

Re: *Angela H. Bain v. Kenneth L. Childs and Denise C. Lawson*
Appellate Case Number: 2018-001991
Civil Action Number: 2019-CP-12-00334
Our File No.: 2186250

Dear Ms. Kitchings:

Enclosed please find attached the Respondent, Kenneth L. Childs Motion for Extension of Time Within Which to File and Serve the Initial Brief of Respondent and Designation of Matter to be Included in the Record and Proof of Service with a check in the amount of \$25.00 for filing.

Ms. Shannon Polvi, attorney for Angela Bain has consented to the extension. Please see the attached email.

Please file the original and two copies to clock and return to the courier.

Please do not hesitate to contact me if you have any questions.

With kind regards, I am

Very truly yours,

MONTGOMERY WILLARD, LLC



Cristy Bradley
Paralegal to Michael H. Montgomery