

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

The Honorable Daniel E. Van Slambrook, Circuit Court Judge

RECEIVED  
MAR 06 2019  
SC Court of Appeals

Appellate Case No.: 2018-001993

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

vs.

Belinda Fox and Gerry Fox.....Appellants

**CONSENT MOTION FOR  
ENLARGEMENT OF TIME**

Counsel for the Respondents Ronald E. Price and Diana R. B. Price (“Respondents”) hereby moves this court for an enlargement of time within which to file and serve the Respondents’ initial brief and designation of matter. The Respondent Prices’ initial brief and designation of matter is otherwise due March 11, 2019. The Respondents request an extension of thirty days which would make the initial brief and designation of matter due on April 10, 2019. This is Respondents second request for an enlargement of time.

The grounds for this motion are that Respondents’ counsel works in a small firm with one other lawyer, Tobias G. Ward, Jr. Mr. Ward was diagnosed with a serious illness and had major surgery on February 3, 2019. He has been out of the office since

that time and the undersigned has been helping with his cases and clients as well his own. This has diminished the time available to focus on drafting Respondents' brief and designation of matter. I need this time to properly prepare the brief and review with my clients. I have been working on the brief and designation of matter and am confident that I will be able to complete the task with this additional time.

I have consulted with Appellant's counsel who consents to this relief.



J. Derrick Jackson, ID#05836  
P.O. Box 50124  
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(803) 708-4200  
dj@tobywardlaw.com  
Attorneys for Respondents  
(803) 708-4200

Dated: March 6, 2019

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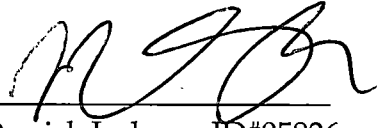
**PROOF OF SERVICE OF RESPONDENTS'  
MOTION FOR ENLARGMENT OF TIME**

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J. Derrick Jackson, counsel for the Respondents, hereby certifies I served the foregoing motion for enlargement of time on the Appellant and other counsel by mailing a copy of the same on March 6, 2019, postage prepaid as follows:

Paul B. Ferrara, III, Esq.  
2300 Otranto Road  
North Charleston, SC 29406  
Attorney for Appellants

Carl B. Hubbard, Esq.  
2201 Middle Street, Box 15  
Sullivan's Island, SC 29482  
Other counsel



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J. Derrick Jackson, ID#05836  
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Columbia, SC 29250  
(803) 708-4200  
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Attorneys for Respondents

Date: March 6, 2019

TOBIAS G. WARD, JR., PA  
— ATTORNEYS AT LAW —

TOBIAS G. WARD, JR.  
tw@tobywardlaw.com

J. DERRICK JACKSON  
dj@tobywardlaw.com

March 6, 2019

**HAND DELIVERED**

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

RECEIVED

MAR 06 2019

SC Court of Appeals

RE: Ronald E. Price and Diana R. B. Price (Respondents)  
-vs- Belinda Fox and Gerry Fox (Appellants)  
Appellate Case No.: 2018-001993  
Consent Motion For Enlargement Of Time

Dear Ms. Kitchings:

Enclosed for filing are the original and six (6) copies of a motion for a thirty (30) day enlargement of time to file Respondents' initial brief and designation of matter which would otherwise be due on March 11, 2019. Appellant's counsel has consented to this relief. This is Respondents' first request for enlargement of time. If the enlargement is granted, the Respondents' initial brief and designation of matter would be due on April 10, 2019.

Also enclosed for filing is the proof of service of the same showing service on counsel and our firm check for \$50.00 for the filing fee. Please file the originals and return the copies to our courier.

Thank you for your assistance.

Respectfully

TOBIAS G. WARD, JR., PA

J. Derrick Jackson

TGW, Jr./ wrc

Enclosures

cc: Paul B. Ferrara, III (w / enclosures)  
Carl Hubbard (w/ enclosures)