

The State of South Carolina
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Appellant Case No: 2015-CP-10-04860

Navy Federal Credit Union

Respondent,

v.

William T. Simmons, III,
Laura Ferguson; and Ford Motor
Credit Company LLC, Defendants,

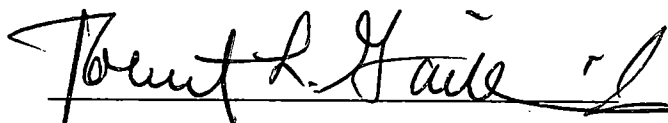
Of whom Laura Ferguson is the Appellant.

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SC Court of Appeals

MOTION TO EXPAND TIME TO
CORRECT INITIAL BRIEF

Now comes the attorney for the Appellant Laura Ferguson moving before this Honorable Court For An EXPANSION OF TIME TO CORRECT THE INITIAL BRIEF on the following grounds.

- (1) For some inexplicable reason the letter from the court date January 16, 2019 was not delivered to 1072 King St, Suite E until January 22, 2019.
- (2) Appellant's attorney miscalculated the time to reply.
- (3) Appellants attorney is just recovering from two (2) tragic losses including the death of his youngest daughter in an automobile accident on October 6, 2018 and the death of his wife on November 10, 2018 and has experienced periods of lack of concentration. I have been treated two (2) times in the past ninety (90) days by my personal physician, Dr. Thaddeus J. Bell 3951 W. Montague Ave North Charleston, SC 29418 for grief related issues.


Robert L. Gailliard, Attorney for Laura Ferguson
SC Bar # 2284

Other Counsel of Record:

John B Kelchner
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Attorney for Appellant

PROOF OF SERVICE OF A NOTICE OF APPEAL

The State of South Carolina
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

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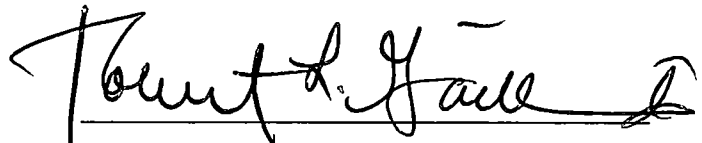
Of whom Laura Ferguson is the Appellant.

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PROOF OF SERVICE

I certify that I have served Motion to Expand Time to Correct Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, addressed to attorneys of record, John B Kelchner P.O. Box 8237 Columbia, SC 294202.

March 1, 2019



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

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March 1, 2019
MAR 04 2019
SC Court of Appeals

Re: Laura Ferguson Appeal
Appellate Case No: 2018-001184

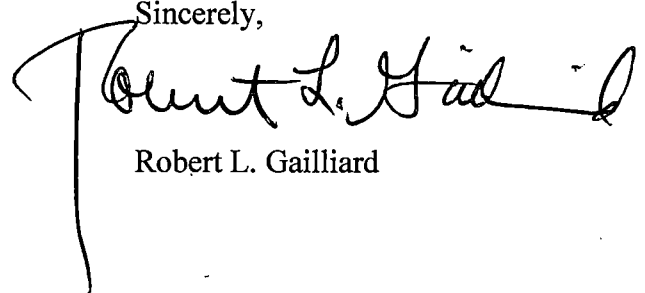
Dear Ms. Allen:

Enclosed please find the corrected Initial Brief of the Appellant, the Certificate of Counsel, Proof of Service of designated matter, and all of the corrections required by the court.

Also, enclosed please find my Motion to expand the time to submit the corrected initial brief along with my Proof of Service to all counsel of record.

RLG/drs

Sincerely,



Robert L. Gailliard

Copy: Jennifer Ferguson
John B. Kelchner, ESQ.

ROBERT L GALLIARD
ATTORNEY AT LAW
1072 King Street Suite E
Charleston SC 29403



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