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**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**RECEIVED**  
MAR 22 2019  
SC Court of Appeals

Appeal from Horry County  
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2015-CP-26-05573

K.A. Diehl and Associates, Inc.,

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins, Mark  
dos Santos, Nancy Moore, William Moore, Steven Dame and Errol  
dos Santos,

Defendants,

Of whom Mark dos Santos is

Appellant.

**MOTION FOR EXTENSION OF TIME**

YOUNG CLEMENT RIVERS, LLP  
D. Jay Davis Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
Perry M. Buckner IV (SC Bar No. 100031)  
J. Joseph Owens (SC Bar No. 102794)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 577-4000  
*Attorneys for Appellant*

COMES NOW Appellant Mark dos Santos, by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve his initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed February 22, 2019, the deadline for Appellant's initial brief and designation of matter is March 21, 2019. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 30 days (from March 21, 2019), i.e., through April 22, 2019<sup>1</sup>. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant him an additional extension of 30 days' time to file/serve his initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving his initial brief and designation of matter would be April 22, 2019, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold his present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

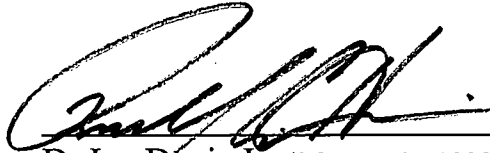
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<sup>1</sup> Calculating the 30-day period (from March 21, 2019) in accordance with Rule 263(a), SCACR, it runs until Monday, April 22, 2019, because the 30<sup>th</sup> day is Saturday, April 20, 2019.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



D. Jay Davis Jr. (SC Bar No. 12084)

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Perry M. Buckner IV (SC Bar No. 100031)

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*Attorneys for Appellant*

Charleston, South Carolina

Dated: 3/20/19

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Defendants,

Of whom Mark dos Santos is

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
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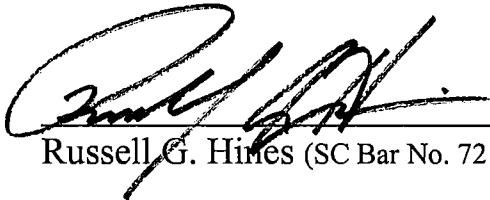
I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, Mark dos Santos, do hereby certify that I have served the **Motion for Extension** on all other parties to this appeal by depositing a copy of the same in the United States Mail, postage prepaid, on March 20, 2019, addressed as follows to all counsel of record:

Henrietta U. Golding, Esquire  
Alicia E. Thompson, Esquire  
McNair Law Firm, P.A.  
P.O. Box 336  
Myrtle Beach, SC 29578  
*Attorneys for KA Diehl and Associates, Inc.*

Jackson H. Daniel, III, Esquire  
Carlock Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
*Attorney for Mark dos Santos*

YOUNG CLEMENT RIVERS, LLP

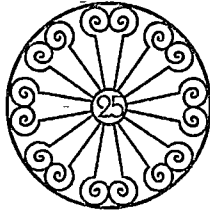
By:



Russell G. Hines (SC Bar No. 72100)

Charleston, South Carolina

Dated: 3/20/19



# YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
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E-mail: kbarnes@ycrlaw.com

March 20, 2019

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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MAR 22 2019  
SC Court of Appeals

Re: K.A. Diehl and Associates, Inc. v. James Perkins, Colleen Franke, a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steven Dame, and Errol Dos Santos  
Appellate Case No.: 2018-002009  
Case No.: 2015-CP-26-05573  
YCR File: 14168-20180194

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter, please find the original and Seven (7) copies of a Motion for Extension of Time and the original and One (1) copy of the Proof of Service of same. Also enclosed is our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return one court-stamped copy of each to me in the pre-stamped envelope provided.

By copy of this letter with enclosures, I am providing all counsel of record with a copy of this Motion for Extension.

As always, thank you for your assistance. If you have any questions or concerns, please do not hesitate to contact me. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes  
Secretary

Enclosures

cc: Henrietta U. Golding, Esquire, McNair Law Firm, P.A.  
Alicia E. Thompson, Esquire, McNair Law Firm, P.A.  
Jackson H. Daniel, III, Esquire, Carlock Copeland & Stair, LLP

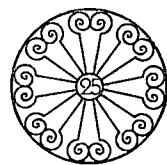
✓

03/20/2019  
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**YCR LAW**  
Young Clement Rivers, LLP

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RGH  
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