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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS

RECEIVED

APR 22 2019

Honorable Daniel E. Van Slambrook, Circuit Court Judge SC Court of Appeals

CASE NO. 2004-CP-08-1855

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

v.

Belinda Fox and Gerry Fox Petitioners

NOTICE OF MOTION AND MOTION TO EXTEND TIME

For good cause shown, Petitioners, Belinda Fox and Gerry Fox, by and through their attorney, Paul B. Ferrara, III hereby would respectfully ask this court for a fourteen (14) day extension of time, making the deadline May 4, 2019, to file the Reply Brief. The Respondents filed an Initial Brief that is Forty-Nine (49) pages in length. Due to the length and complexity of the Respondent's Brief, the Petitioners, by and through their attorney Paul B. Ferrara III, requests that the Court grant Petitioners an additional fourteen (14) days to review and respond to the Respondent's brief.

Attorney Paul B. Ferrara, III, has contacted the Respondents attorney, Derrick Jackson via electronic mail and he has consented to an extension of time.

WHEREFORE, Petitioners respectfully pray that this Honorable Court enter an Order allowing an additional fourteen (14) days to file a Reply Brief, making the Reply Brief due on May 4, 2019.

Respectfully Submitted,
FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III
2300 Otranto Road
North Charleston, SC 29406
S.C. Bar 70511
(843) 569-5511
(843) 569-5411 Fax
Attorney for Petitioners

April 17, 2019
North Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS

Dale Van Slambrook, Circuit Court Judge

CASE NO. 2004-CP-08-1855
APPELLATE CASE NO. 2018-001993

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SC Court of Appeals

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

Respondents,

v.


Belinda Fox and Gerry Fox,

Petitioners.

PROOF OF SERVICE

I, the undersigned counsel, hereby certify that I have served Petitioner's motion to extend time to file Reply Brief of Petitioners by depositing a copy of the same in the United States Mail, postage prepaid, on April 17, 2019, addressed to their attorney of record, James Derrick Jackson, Esquire, and Tobias G. Ward, Jr. P.A., P.O. Box 50124 Columbia, SC 29250.

Respectfully submitted this 17th day of April 2019.


Paul B. Ferrara, III
SC Bar No. 70511
2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511 / (843) 569-5411 fax
paul@ferraralawfirm.net
Attorney for Appellants

Ferrara Law Firm, PLLC

2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511 / Fax (843) 569-5411

Paul B. Ferrara, III*
Janel K. Ferrara*
Alex S. Fadoul

*(also Admitted in N.C.)

April 17, 2019

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APR 22 2019
SC Court of Appeals

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

Re: Ronald E. Price and Diana R.B. Price v. Belinda Fox and Gerry Fox
Appellate Case No.: 2018-00-1993
Our File No.: 15-614

Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of a motion to extend time and a proof of service regarding the same in the above referenced case. I have enclosed a Fifty (\$50.00) Dollar filing fee as well.

Please file the originals and return a clocked copy to our office in the self-addressed, stamped envelope which is enclosed.

Sincerely,

FERRARA LAW FIRM, PLLC



Cassidy Silliman
Paralegal to Ferrara Law Firm

Enclosure

cc: J. Derrick Jackson, Esq.

Paul B. Ferrara, III
Ferrara Law Firm, PLLC
2300 Otranto Road
North Charleston SC 29406

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The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211-1629

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SC Court of Appeals