

**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

APR 19 2019

SC Court of Appeals

Angela H. BainAppellant,

v.

Denise C. Lawson and Kenneth L. ChildsRespondents.

**APPELLANT’S MOTION FOR EXTENSION
OF TIME TO FILE AND SERVE THE
REPLY BRIEF OF APPELLANT**

YOU WILL PLEASE TAKE NOTICE, that pursuant to Rules 208, 209, and 240 of the South Carolina Appellate Court Rules, the Appellant, Angela H. Bain, by and through her undersigned attorney, moves to extend the due date in which to file and serve her Reply Brief to April 26, 2019. This motion is the Appellant’s first request for an extension. The Appellant believes no party will be prejudiced by the extension sought by this Motion. Counsel for Appellant has contacted both counsel for each of the Respondents requesting their consent to this motion. Both counsel for the Respondents have been contacted with a request for consent. Counsel for Kenneth Childs consents to this motion. As of the drafting of this Motion counsel for Denise Lawson has not granted or denied consent to the requested extension.

Respectfully Submitted,

CROMER BABB PORTER & HICKS, LLC

BY: 

J. Lewis Cromer (#1470)
Shannon M. Polvi (#101837)
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Facsimile 803-799-9533
Attorneys for Appellant

April 18, 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 REPLY BRIEF** on the Respondents, email on the 18th day of April 2019 and by U.S. Mail on the 22nd of April 2019, addressed to their attorney of record:

Attorney for Respondent Kenneth L. Childs

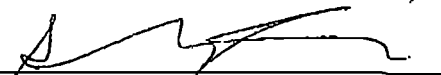
Michael H. Montgomery, Esquire (#4034)
MONTGOMERY WILLARD, LLC
Post Office Box 11886
Columbia, South Carolina 29211-1886
mhm@montgomerywillard.com

Attorney for Respondent Denise C. Lawson

Eugene H. Matthews, Esquire (#10193)
RICHARDSON PLOWDEN & ROBINSON, P.A.
Post Office Drawer 7788
Columbia, South Carolina 29202
GMatthews@RichardsonPlowden.com

CROMER BABB PORTER & HICKS, LLC

BY: _____


J. Lewis Cromer (#1470)
Shannon M. Polvi (#101837)
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Facsimile 803-799-9533
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C | B | P | H**CROMER BABB PORTER & HICKS, LLC***Attorneys and Counselors at Law*J. Lewis Cromer * Julius W. Babb, IV * J. Paul Porter * Ryan K. Hicks
Shannon M. Polvi * Samantha E. Albrecht * Elizabeth M. Bowen

April 18, 2019

RECEIVEDVia Fax 803-734-1839

APR 19 2019

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

SC Court of Appeals

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

Dear Ms. Kitchings:


Herewith this letter, enclosed please find Appellant's Motion for Extension of Time to File and Serve the Reply Brief of Appellant.

I called the Court of Appeals office to confirm the process for how best to proceed with the filing of the motion for extension due to the following. The Appellant's Reply Brief is due on Monday, April 22, 2019. I have not finished the briefing and I am about to embark on a pre-planned trip to Colorado for the Easter holiday. I embark on that trip early tomorrow morning, before the Court of Appeals is open. Our firm is closed tomorrow for Good Friday, so our staff will also be off work. I have reached out to counsel for the Respondents to obtain their consent to the motion for extension. Mike Montgomery, counsel for Mr. Childs, consents. I have not yet heard from Gene Matthews, counsel for Mrs. Lawson, but it was a recent contact, so he likely has not had an opportunity to respond.

Per my recent call with the Court of Appeals office, I will fax in this Motion today and we will physically file the motion, with the filing fee, on Monday, April 22, 2019.

Please feel free to contact me should you have any questions. Thank you in advance for your attention to this matter.

Sincerely,



Shannon Polvi

*Enclosures*Cc: Eugene Matthews, Esquire
Michael Montgomery, Esquire
Client