

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

HONORABLE MARVIN H. DUKES, III
BEAUFORT COUNTY MASTER-IN-EQUITY AND
SPECIAL CIRCUIT COURT JUDGE

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MAY 31 2019
SC Court of Appeals

CASE NO.: 2018-CP-07-00796

Stancel E. Kirkland and
El Cid Holdings, LLC,

Respondents,

vs.

Robert Wolfson,

Appellant.

NOTICE OF MOTION AND MOTION FOR
EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN RECORD ON APPEAL

The Appellant would respectfully request an extension of time within which to file the Initial Brief and Designation of Matter to be Included in Record on Appeal. The Initial Brief and Designation are due to be filed no later than May 31, 2019. The Appellant would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Respondents.

It is accordingly respectfully requested that the Appellant be granted until June 30, 2019 to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal.

MOSS, KUHN & FLEMING, P.A.

By: 

H. Fred Kuhn, Jr.
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(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina
May 29, 2019

Attorneys for Appellant

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Appellant.

CERTIFICATE OF SERVICE

Undersigned certifies that the **Notice of Motion and Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in Record on Appeal**, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Maryann Elizabeth Blake, Esquire
Woodard & Butler
Post Office Box 1906
Walterboro, South Carolina 29488-0020

Eugene H. Matthews, Esquire
Richardson Plowden Robinson, P.A.
Post Office Drawer 7788
Columbia, South Carolina 29202

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SC Court of Appeals

S. Jahue Moore, Esquire
Ralph Nicholas Riley, Jr., Esquire
Moore Taylor Law Firm
Post Office Box 5709
West Columbia, South Carolina 29171

in a post office or official depository under the exclusive care and custody of the United States

Postal Service, on May 29, 2019.

By:  _____
Sue Radford

LAW OFFICES

MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*

1501 North Street P.O. Drawer 507~Beaufort, South Carolina 29901-0507
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*ALSO MEMBER OF GA BAR

May 29, 2019

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Stancel E. Kirkland and El Cid Holdings, LLC v. Robert Wolfson
Appellate Case No.: 2019-00203

Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Appellant Motion for Extension of Time to File the Initial Brief and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter along with my firm's check in the amount of \$50.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of the motion on all counsel of record.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.

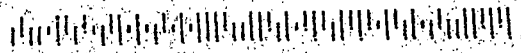
H. Fred Kuhn, Jr.

HFKjr:sr

Enclosures

cc: Maryann Elizabeth Blake, Esquire
Eugene Hamilton Matthews, Esquire
S. Jahue Moore, Esquire
Ralph Nichols Riley, Jr., Esquire

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CHARLESTON SC 294

WED 23 MAY 2019 PM

HFK
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Wolfson

To:

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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