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**THE STATE OF SOUTH CAROLINA
IN THE 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, William Moore, Steven Dame
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE
INITIAL REPLY BRIEF OF APPELLANT**

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JUN 03 2019

SC Court of Appeals

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
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 577-4000

Attorneys for Appellant

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS


COMES NOW Appellant, Mark dos Santos, by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' time to file/serve his initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief and designation of matter is today, May 31, 2019. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from May 31, 2019), i.e., through June 10, 2019. Respectfully, Appellant believes 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 extension of 10 days' time to file/serve his initial reply 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 Appellant's initial reply brief and designation of matter would be June 10, 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.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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)
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Attorneys for Appellant

Charleston, South Carolina

Dated: 5/31/18

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Of whom Mark Dos Santos is the

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PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellant, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on May 31, 2019, properly posted for delivery to the following addressees:


Henrietta U. Golding, Esquire
Alicia E. Thompson, Esquire
Burr & Forman, LLP
P.O. Box 336
Myrtle Beach, SC 29578

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

and

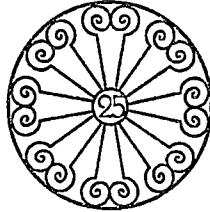
Wm. Grayson Lambert, Esquire
Burr & Forman LLP
P.O. Box 11390
Columbia, SC 29211
*Attorneys for Respondent
K.A. Diehl and Associates, Inc.*

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina
Dated: 5/31/19



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

May 31, 2019

VIA US MAIL AND FASCIMILE

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

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
YCR File: 14168-20180194

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our Motion for Extension of Time to File/Serve Initial Reply Brief of Appellant, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$50.00 to cover the filing fee. Please file the originals and return court-stamped copies to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

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JUN 03 2019

SC Court of Appeals


Kathleen B. Barnes
Secretary

Enclosures

(all via US Mail and email)

Cc: Henrietta U. Golding, Esquire
Alicia E. Thompson, Esquire
Wm. Grayson Lambert, Esquire
Jackson H. Daniel, III, Esquire

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05/31/2019

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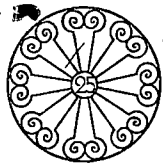
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