

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

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Appeal from Horry County  
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

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Appellate Case No. 2018-002009  
Trial Court Case No. 2015-CP-26-05573

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**RECEIVED**

JUN 07 2019  
SC Court of Appeals

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.

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**MOTION FOR EXTENSION OF TIME**

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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 ten (10) days' additional time to file/serve his initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed June 4, 2019, the deadline for Appellant's initial reply brief and designation of matter is June 10, 2019. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from June 10, 2019), i.e., through June 20, 2019. 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 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 his initial reply brief and designation of matter would be June 20, 2019, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold his present deadline in abeyance until it acts upon this motion.

*[Signature on next page]*

*[Signature page for Motion for Extension of Time, Appellate Case No. 2018--002009]*

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: 6/9/15

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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  
D. Jay Davis Jr. (SC Bar No. 12084)  
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Charleston, South Carolina 29401  
(843) 577-4000  
*Attorneys for Appellant*

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 June 7, 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.*

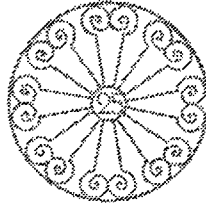
Jackson H. Daniel, III, Esquire  
Carlock Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
*Attorney for Mark dos Santos*

YOUNG CLEMENT RIVERS, LLP

By   
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)

Charleston, South Carolina

Dated: 6/7/19



**YCR LAW**

**Kathleen B. Barnes**  
Secretary

Direct Dial: (843) 720-5438  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

June 7, 2019

**RECEIVED**

JUN 07 2019

SC Court of Appeals

**VIA US MAIL AND FACSIMILE**

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, 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,

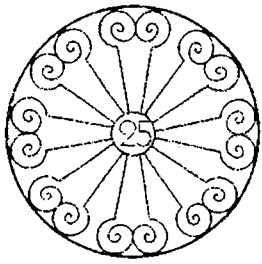
YCR LAW, LLP

Kathleen B. Barnes  
Secretary

Enclosures

(all via US Mail and email)

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



# YCR LAW

Young Clement Rivers, LLP

All Business, Insurance, Real Estate and Regulatory Matters  
Admiralty/Marine • Appellate • Commercial Litigation  
Commercial Real Estate • Commercial Transactions  
Community Association Law • Construction Law  
Employment and Labor Law • Health Care • Insurance Coverage  
Products Liability • Professional Liability • Retail Liability  
Special Task Litigation • Tax, Estate Planning and Probate  
Trucking and Transportation • Workers Compensation

**THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY**

To: 18037341839  
From: kbarnes@ycrlaw.com  
Date: June 07, 10:49:15 AM EDT  
Subj: K.A. Diehl v. James Perkins, et al; Case No.: 2018  
Pages: 7

Good morning,

Attached please find documents regarding our motion for extension in the above-referenced matter. The originals together with all copies and the filing fee have been placed in the mail. Please do not hesitate to let us know if you need anything further.

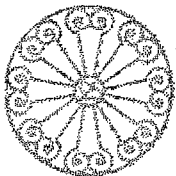
Thank you!

Katy B. Barnes  
Commercial Litigation Secretary to  
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines  
YCR LAW  
25 Calhoun Street, Suite 400  
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SC Court of Appeals



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