

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

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Appeal from Dorchester County  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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Appellate Case No. 2019-000644  
Trial Court Case No. 2012-CP-18-02583

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Jennifer McFarland and Carlton Holcombe,

Appellants,

v.

Thomas Morris and David Hannemann,

Respondents.

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

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YOUNG CLEMENT RIVERS, LLP  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for the Appellants*

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JUN 07 2019  
SC Court of Appeals

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

COME NOW Appellants Jennifer McFarland and Carlton Holcombe, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed May 15, 2019, the deadline for Appellant's initial brief and designation of matter is June 12, 2019. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 30 days (from June 12, 2019), i.e., through July 12, 2019. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of 30 days' time to file/serve their initial 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 their initial brief and designation of matter would be July 12, 2019, according to the undersigned's calculations. Further, Appellants respectfully requests that the Court hold their present deadline in abeyance until it acts upon this motion.

*[Signature on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate Case No. 2019-000644]*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400 (29401)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

*Attorneys for the Appellant*

Charleston, South Carolina

Dated: 6/9/19

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Jennifer McFarland and Carlton Holcombe,

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
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*Attorneys for the Appellants*

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SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **Motion for Extension of Time to File/Serve Initial Brief of Appellants** on the above-named Respondents by depositing a copy of the same in the United States Mail, postage prepaid, on ~~June 8, 2019~~<sup>7</sup>, addressed as follows to Respondent's counsel:

Morgan S. Templeton, Esquire  
William "Trey" W. Watkins, Jr., Esquire  
John Joseph Dodds, IV, Esquire  
Wall Templeton & Haldrup, P.A.  
Post Office Box 1200  
Charleston, SC 29402  
*Attorneys for Respondents*

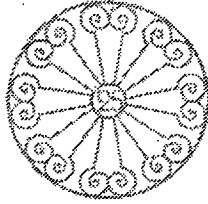
YOUNG CLEMENT RIVERS, LLP

By:

  
\_\_\_\_\_  
Russell G. Hines  
*Attorneys for Appellants*

Charleston, South Carolina

Dated: 6/7/19



**YCR LAW**

**Kathleen B. Barnes**  
Secretary

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

June 7, 2019

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JUN 07 2019  
SC Court of Appeals

**VIA US MAIL AND FASCIMILE**

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

Re: Jennifer McFarland and Carlton Holcombe v. Thomas Morris and David  
Hannemann  
Appellate Case No.: 2019-000644  
YCR File: 15508-20150613

Dear Ms. Kitchings:

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

With best wishes and kindest regards, I am

Sincerely,

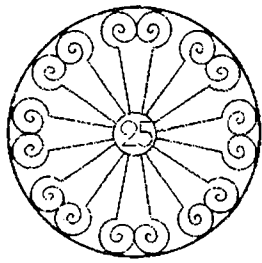
YCR LAW, LLP

Kathleen B. Barnes  
Secretary

**Enclosures**

(all via US Mail and email)

cc: Morgan S. Templeton, Esquire, Wall Templeton & Haldrup, P.A.  
William "Trey" W. Watkins, Jr., Esquire, Wall Templeton & Haldrup, P.A.  
John Joseph Dodds, IV, Esquire, Wall Templeton & Haldrup, P.A.



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To: 18037341839  
From: kbarnes@ycrlaw.com  
Date: June 07, 10:22:49 AM EDT  
Subj: McFarland v. Morris, et al; Case No.: 2019-000644  
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.

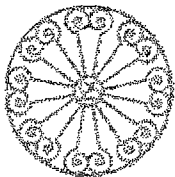
Thank you!

Katy B. Barnes  
Commercial Litigation Secretary to  
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines  
YCR LAW  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
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