

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Case No. 2018-002095

Jeanne Knollinger,

Appellant,

v.

Ryan Noel Oliver,

Respondent

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JUN 10 2019
SC Court of Appeals

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEFS

Counsel for appellant respectfully requests an extension of thirty (30) days, **until July 17, 2019**, in which to file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009.

This is a third request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court June 17, 2019. The Court has granted counsel two previous extensions.
2. Counsel for appellant respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage his caseload, counsel hopes that no further extension requests will be necessary.

3. Counsel for appellant respectfully submits that such extraordinary circumstances include but are not limited to counsel's heavy work-load with multiple court appearances and scheduling conflicts around the state.
4. Counsel makes this request in good faith and not for purpose of delay.
5. Counsel for the Respondent has graciously consented to this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty day extension, **until July 17, 2019**, in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,



Ryan C. Andrews
Partner, Cobb, Dill & Hammett, LLC

Attorney for Appellant

This 7th day of June, 2019

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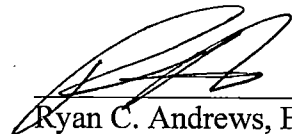
Respondent.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies Appellant's Third Motion for Extension of Time to File Initial Briefs regarding the above-referenced case has been served upon all parties to this matter this 7th day of June, by depositing a true copy of the same in the U.S. Mail, proper postage prepaid, addressed to counsel as follows:

Langdon Cheves III
Sarah Day Hurley
Turner Padget Graham & Laney, PA
PO Box 1509
Greenville, SC 29602



Ryan C. Andrews, Esq.

Ryan C. Andrews, Partner (SC)
Hal E. Cobb, Partner (SC/CO)
Michael H. Dill, Partner (SC)
William S. Hammett III, Partner (SC/GA)

Stefanie L. Huffer, Associate (SC)
Bryan A. Raymond, Associate (SC)
Stephanie M. Richards, Associate (SC)

Sean A. Scapellato, Partner (SC)
David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Slocum Jr., Associate (SC)

June 7, 2019

SENT VIA FIRST CLASS MAIL AND FACSIMILE

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

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Re: *Jeanne Knollinger v. Ryan Noel Oliver*
Appellate Case No.: 2018-002095

Dear Ms. Kitchings:

Enclosed for filing are the original and one (1) copy of Appellant's Third Motion for Extension of Time to File Initial Briefs as well as the \$50.00 filing fee. Please file the original and return a clocked copy of the enclosed documents in the envelope provided. Thank you very much and should you have any questions concerning the matter, please do not hesitate to contact me.

Sincerely,



Ryan C. Andrews
Enclosures

Cc: Langdon Cheves III (w/ enclosures)

CD COBB DILL &
&H HAMMETT, LLC

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