

90309

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHESTERFIELD COUNTY  
COURT OF COMMON PLEAS

Larry W. Knox, Special Referee

Appellate Case No: 2019-000674

**RECEIVED**  
JUL 18 2019  
SC Court of Appeals

Griffin Chrysler Dodge Jeep, Inc.,

Plaintiff,

v.

Tony Edward Sipe,

Defendant,

and

Tony Edward Sipe,

Respondent,

v.

Jason S. King,

Appellant.

MOTION FOR EXTENSION OF TIME

The Respondent, above-named, by and through counsel hereby moves for an additional thirty (30) day extension of time to file Respondent's initial reply brief in the above-captioned appeal, based upon the following reasons:

- a) Counsel for Respondent is in private practice;
- b) In addition, counsel for appellant are preparing for an upcoming murder trial in Florence County and preparation for the same has prevented the ability of counsel for Respondent to completely focus on this appeal;
- c) In addition, Counsel for Respondent has been in various family court trials six of the last ten work days, one having also been a federal holiday;
- d) Counsel needs additional time to speak with his client to finalize the brief;

- e) Due to Counsel's current case load, Counsel has not had adequate time to finalize the reply brief; and
- f) Counsel submits that no further extensions will be necessary.

Given the facts set forth above, counsel for Respondent does not believe his request is unreasonable, nor that any party will be prejudiced if this extension is granted.

Based upon the foregoing, Respondent respectfully requests a Thirty (30) day extension of time to file Respondent's initial reply brief.

Respectfully Submitted,



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M. W. COCKRELL III  
SARAH C. CAMPBELL  
159 Main Street  
Chesterfield, South Carolina 29709

July 16, 2019  
Chesterfield, South Carolina

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Appellant.

PROOF OF SERVICE

I certify that Respondent's Motion for Extension of Time was served on Appellant by delivering a copy via United States Mail to his attorney, Robert T. King, Esquire at the address Post Office Box 1764, Florence, South Carolina 29503, postage prepaid, on the date referenced below.

COCKRELL LAW FIRM, PC

July 16, 2019  
Chesterfield, South Carolina

  
M.W. Cockrell, III, SC BAR # 69417  
Sarah C. Campbell, SC BAR # 100581  
159 Main Street  
Chesterfield, South Carolina 29709  
(843)623-5911  
Attorneys for Respondent

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SC Court of Appeals  
Plaintiff,



**COCKRELL**  
LAW FIRM, P.C.

July 16, 2019

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

Re: Griffin Chrystler Dodge Jeep, Inc. v. Tonny Edward Sipe and Tony Edward Sipe v.  
Jason S. King  
Appellate Case No.: 2019-000674

Dear Madam Clerk:

Enclosed herewith, please find Respondent Tony Edward Sipe's request for an additional 30-day extension in which to file Respondent's initial brief and with a proof of service. I would appreciate your filing the originals and returning a "received" copy to my office in the enclosed self addressed envelope.

Should you have any questions or require additional information, please do not hesitate to call.

With highest regards, I remain

Sincerely,

  
M. W. Cockrell, III

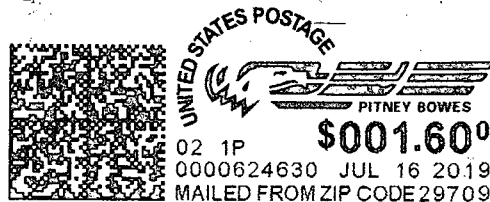
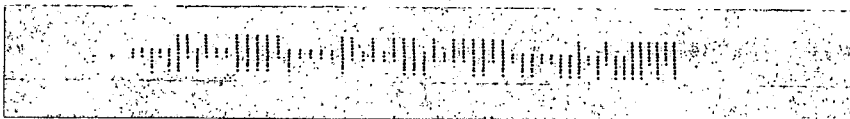
cc: Robert Thomas King, Esquire  
Post Office Box 1764  
Florence, South Carolina 29503

Wallace H. Jordan, Jr., Esquire  
Post Office Box 2010  
Florence, South Carolina 29503

M.W. Cockrell, III (SC)  
Sarah C. Campbell (SC)  
M.W. Cockrell, Jr. (TX)\*+

\*of counsel  
+ Board Certified: Oil, Gas & Mineral Law  
Texas Board of Legal Specialization

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0000624630 JUL 16 2019

MAILED FROM ZIP CODE 29709

**COCKRELL LAW FIRM PC**

**Barrister Building**  
159 Main St  
Chesterfield, SC 29709

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Columbia, SC 29211

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**JUL 18 2019**

**SC Court of Appeals**