

THE STATE OF SOUTH CAROLINA  
COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

AUG 07 2019  
SC Court of Appeals

THE HONORABLE JENNIFER B. MCCOY, CIVIL COURT JUDGE

APPELLATE CASE NO: 2019-000574

ELIZABETH LOFTON.....APPELLANT

VS.

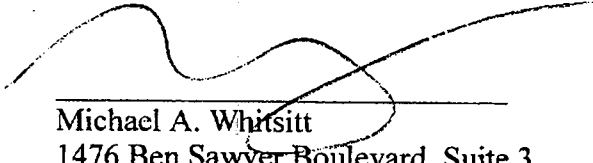
BERKELEY COUNTY ELECTRIC COOPERATIVE INC.  
& JOHN LUCAS TREE EXPERT  
COMPANY,.....RESPONDENTS

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF AND DESIGNATION

With consent of both Helen F. Hister, Esquire (for Respondent John Lucas Tree Expert) and Pope Johnson III, Esquire (for Respondent Berkeley), Appellant by and through her attorney move for a fifteen (15) day extension of time to file their reply brief and their Designation of Matter to be included in the Record on Appeal from August 8, 2019 to August 23, 2019

(REMAINDER OF PAGE LEFT BLANK; SIGNATURE BLOCK ON NEXT PAGE)

WHITSITT LAW FIRM



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Michael A. Whitsitt  
1476 Ben Sawyer Boulevard, Suite 3  
Charleston, South Carolina 29407  
(843)696-8904  
ATTORNEY FOR APPELLANT

August 7, 2019  
Charleston, South Carolina

Other Counsel of Record:

Helen F. Hiser, Esquire  
PO BOX 650007  
Mt. Pleasant, South Carolina 29465

Pope Johnson, III Esquire  
1230 Richland Street  
Columbia, SC 29201

J. Jay Hulst  
209 East Main Street  
Moncks Corner, SC 29461

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VS.

**BERKELEY COUNTY ELECTRIC COOPERATIVE INC.  
& JOHN LUCAS TREE EXPERT  
COMPANY.....RESPONDENTS**

**PROOF OF SERVICE**

I certify that I have served the *Motion for Extension of Time for Appellants to file Reply Brief* on Respondents, by depositing a copy of it in the United States Mail, postage prepaid, on December 15, 2008, addressed to its attorneys of record as follows:

Helen F. Hiser, Esquire  
PO BOX 650007  
Mt. Pleasant, South Carolina 29465

Pope Johnson, III Esquire  
1230 Richland Street  
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WHITSITT LAW FIRM



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(843)696-8904  
ATTORNEY FOR APPELLANT

August 7, 2019  
Charleston, South Carolina

**Recipient Information**

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**From: Michael Whitsitt**  
**Company: The Whitsitt Law Firm**  
**Email address: mawhitsitt@gmail.com (from 73.131.109.247)**  
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SC Court of Appeals

August 7, 2019

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. BOX 11629  
Columbia, South Carolina 29211

(and by fax 803-734-1839)

RE: Elizabeth Lofton vs. Berkeley County Electric Cooperative, Inc. and John Lucas Tree Expert, Co.; 2019-000574

Civil Action No.: 2018-CP-10-00323

Dear Ms. Kitchings,

Please find enclosed an original and one copy of the following: 1) *Motion for Extension of Time*; 2) *Check for \$50.00 from my trust account*; and 3) *Proof of Service*. Please file the originals and returned the clocked copies to me in the self addressed posted envelope provided.

Respectfully,

Michael A. Whitsitt

Maw/me

CC: Helen Hiser, Esq  
Pope D. Johnson, III Esq.  
John B. Williams, Esq.