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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Mikell R. Scarborough, Master In Equity

Case No. 2019-000205

The Savannah Homeowners Association, Inc.,Respondent,

v.

Denise H. Jones and LVNV Funding, LLC,Defendants,

Of Whom Denise H. Jones is the Appellant.

RECEIVED
AUG 08 2019
SC Court of Appeals

RESPONDENT'S MOTION FOR
EXTENSION OF TIME TO FILE FINAL BRIEF

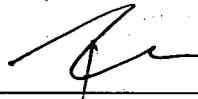
Derek F. Dean
SIMONS & DEAN
147 Wappoo Creek Drive, Suite 604
Charleston, SC 29412
843-762-9132
Attorneys for Respondent

Pursuant to the South Carolina Appellate Court Rules ("SCACR"), Respondent respectfully moves for an Order extending the time to serve and file their Final Brief that is due on August 13, 2019. Due to prior Circuit Court commitments and vacation plans, Respondent requests this Court provide a two (2) week extension and issue an order giving the Respondent until August 27, 2019 to serve and file its Final Brief.

The Respondent requests this extension because, since the service of the Record on Appeal on July 24, 2019, Respondent's counsel was out of the country for a week, will be traveling out of the state for a week and had/has motion and other hearings to prepare for in Circuit Court.

Due to these circumstances, Respondent respectfully asks this Court to grant a two (2) week extension until August 27, 2019 to serve and file their Final Brief.

Respectfully submitted,



aw Derek F. Dean
SIMONS & DEAN
147 Wappoo Creek Drive, Suite 604
Charleston, SC 29412
(843) 762-9132
Attorneys for Respondent

8/5, 2019

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The Savannah Homeowners Association, Inc.,Respondent,

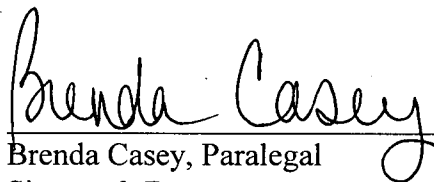
v.

Denise H. Jones and LVNV Funding, LLC,Defendants,

Of Whom Denise H. Jones is the Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time to File Final Brief on Appellant Denise H. Jones by depositing a copy of it in the United States Mail, postage prepaid on August 5, 2019, addressed to her at 506-D Arlington Drive, Charleston, SC 29414.



Brenda Casey, Paralegal
Simons & Dean
147 Wappoo Creek Road, Suite 604
Charleston, South Carolina 29412
(843) 762-9132
Attorneys for Respondent

8/5, 2019
Charleston, South Carolina

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Keating L. Simons, III klsimons@simonsanddean.com

Derek F. Dean dfdean@simonsanddean.com

I. Sonja Taylor istaylor@simonsanddean.com

August 5, 2019

VIA REGULAR MAIL & FACSIMILE (803-734-1839)

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

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SC Court of Appeals

Re: *The Savannah Homeowners Association, Inc. v. Jones, et al.*
Appellate Case No.: 2019-000205


Dear Ms. Kitchings:

Enclosed is the original and six (6) copies of Respondent's Motion for Extension of Time to File Final Brief; the Proof of Service of Respondent's Motion for Extension of Time to File Final Brief and a check in the amount of \$50.00 for the filing fee in connection with the above case. Upon filing, I would appreciate it if you would return the clocked-in copies to me within the self-addressed stamped envelope.

By copy of this letter, I am serving Appellant with a copy of the aforementioned Respondent's Motion for Extension of Time to File Final Brief and Proof of Service of Respondent's Motion for Extension of Time to File Final Brief.

With kind regards, I remain

Yours very truly,



Derek F. Dean

DFD/bdc

Enclosures

cc: Ms. Denise H. Jones (w/enc.)

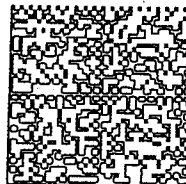
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