

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

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APPELLATE CASE NO. 2019-000076

Case No. 2017-CP-10-03110  
(formerly Probate Court Case No. 2010-ES-10-00413)

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CAROL MANIGAULT,

Appellant,

vs.

MORRIS ELLISON, AS PERSONAL  
REPRESENTATIVE FOR THE ESTATE  
OF ANDREW MANIGAULT,

Respondent.

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AUG 16 2019  
SC Court of Appeals

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APPELLANT'S MOTION FOR EXTENSION OF  
TIME TO FILE RECORD ON APPEAL

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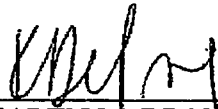
Appellant, by and through her undersigned counsel, moves, pursuant to Rule 224, South Carolina Appellate Court Rules, for an extension of time within which to file the Record on Appeal.

This Motion is based upon the grounds that due to this case being ten (10) years old, it is taking considerable time to review the entire file and create the Record on Appeal. Appellant has not had sufficient time or opportunity to complete the Record on Appeal.

We would respectfully request a thirty (30) day extension of time to file the Record on

Appeal.

Respectfully submitted this 16th day of August, 2019.



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KAREN M. DEJONG, ESQ.  
S.C. Bar No. 70699  
DeJong Law Firm, LLC  
222 West Coleman Blvd., Ste. 110  
Mt. Pleasant, SC 29464-5652  
Tel. No. (843) 216-6161  
Fax No. (843) 300-1080  
[karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com)  
Attorney for Appellant

Other Counsel of Record

James D. Myrick, Esq.  
Womble Bond Dickinson, LLP  
5 Exchange Street  
Charleston, SC 29401  
Tel. No. 843-772-3400  
Fax No. 843-723-7398  
[jim.myrick@wbd-us.com](mailto:jim.myrick@wbd-us.com)  
Attorney for Respondent

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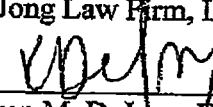
PROOF OF SERVICE

I certify that I have served Appellant's Motion For Extension of Time with which to file the Record on Appeal, on Morris Ellison, by depositing a copy of it in the United States Mail, via commercial delivery, on August 16, 2019, addressed to his attorney of record, James D. Myrick, Esq., Womble Bond Dickinson, LLP, 5 Exchange Street, Charleston, SC 29401.

Dated: August 16, 2019

DeJong Law Firm, LLC

By:

  
Karen M. DeJong, Esq.  
Bar No. 70699

222 West Coleman Blvd., Ste. 110

Mount Pleasant, SC 29464  
Tel. No. 843-216-6161  
Fax No. 843-300-1080  
[karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com)  
Attorney for Appellant



## Shipment Receipt

**Address Information****Ship to:**

Hon. Jenny Abbott Kitchings  
S.C. Court of Appeals  
1220 Senate Street

COLUMBIA, SC  
29201  
US  
8432166161

**Ship from:**

Karen DeJong  
222 West Coleman Blvd.,  
Suite 110  
Mount Pleasant, SC  
29464  
US  
8432166161

**Shipment Information:**

Tracking no.: 776006896467

Ship date: 08/16/2019

Estimated shipping charges: 21.62 USD

**Package Information**

Pricing option: FedEx Standard Rate

Service type: Standard Overnight

Package type: FedEx Envelope

Number of packages: 1

Total weight: 1 LBS

Declared Value: 100.00 USD

Special Services:

Pickup/Drop-off: Drop off package at FedEx location

**Billing Information:**

Bill transportation to: My Account - 419-419

Your reference: Manigault Appeal Mtn to Xtsn R

P.O. no.:

Invoice no.:

Department no.:

**DEJONG LAW FIRM LLC**

**1327**

S.C. Court of Appeals  
5190 Filing Fees

8/5/2019

50.00

Secondary Account #0 Manigault v. Ellison Motion Fee

50.00

**DEJONG LAW FIRM LLC**

**1327**

S.C. Court of Appeals  
5190 Filing Fees

8/5/2019

50.00

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DEJONG LAW FIRM, LLC  
222 West Coleman Blvd., Ste. 110  
Mt. Pleasant, SC 29464  
Tel. No. 843-216-6161  
[karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com)

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AUG 16 2019

SC Court of Appeals

August 16, 2019

Hon. Jenny Abbott Kitchings  
S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Carol Manigault v. Morris Ellison, Personal Representative of the Estate of Andrew Manigault  
Appellate Case No. 12019-000076

Dear Hon. Kitchings:

Enclosed please find an original and SIX (6) copies of Appellant's Motion for Extension of Time to File Record on Appeal, Proof of Mailing and a check in the amount of \$50.00 for the Motion Filing Fee.

Please return a filed copy in the self-addressed stamped envelope which is enclosed for your convenience.

Very truly yours,

  
Karen M. DeJong

KMD:abc

Cc: James D. Myrick, Esq.

## FAX COVER SHEET

TO	Clerk of Court
COMPANY	S.C. Court of Appeals
FAX NUMBER	18037341839
FROM	Karen Dejong
DATE	2019-08-16 19:03:42 GMT
RE	Appellate Case No: 2019-000076

### COVER MESSAGE

Attached please find Appellant's Motion for Extension of Time with which to File the Record on Appeal. Hard copy being sent today by overnight mail.

**RECEIVED**  
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SC Court of Appeals