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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

AUG 19 2019

J. Mark Hayes, II, Circuit Court Judge

SC Court of Appeals

APPELLATE CASE NO. 2019-000076

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

CAROL MANIGAULT,

Appellant,

vs.

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

Respondent.

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

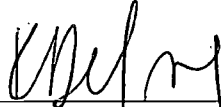
Appellant, by and through her undersigned counsel, moves, pursuant to Rule 224, South Carolina Appellate Court Rules, for an extension of time within which to file the Record on Appeal.

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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S.C. Bar No. 70699
DeJong Law Firm, LLC
222 West Coleman Blvd., Ste. 110
Mt. Pleasant, SC 29464-5652
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Other Counsel of Record

James D. Myrick, Esq.
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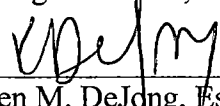
PROOF OF SERVICE

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
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Attorney for Appellant

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August 16, 2019

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

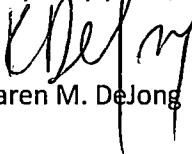
Re: Carol Manigault v. Morris Ellison, Personal Representative of the Estate of Andrew Manigault
Appellate Case No. 12019-000076

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.

ORIGIN ID:RBWA (843) 216-6161
KAREN DEJONG

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222 WEST COLEMAN BLVD.,
SUITE 110
MOUNT PLEASANT, SC 29464
UNITED STATES US

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S.C. COURT OF APPEALS
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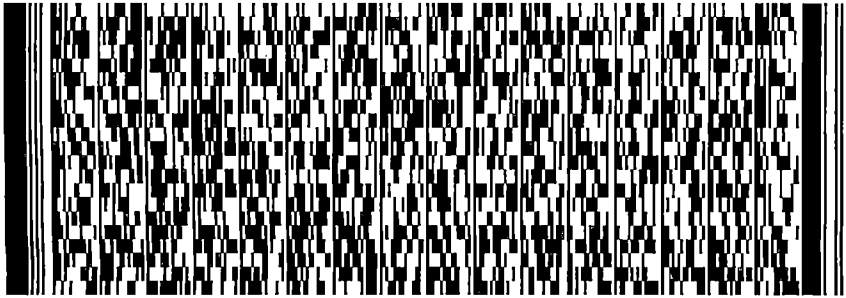
COLUMBIA SC 29201

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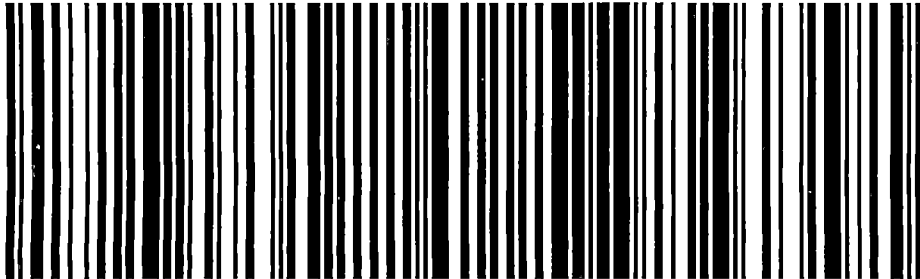
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