

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM YORK COUNTY
Court of Common Pleas

AUG 27 2019

SC Court of Appeals

The Honorable S. Jackson Kimball, III, Special Circuit Court Judge

Case No.: 2015-CP-46-01409
Appellate Case No. 2016-001921

Courtney Feeley Karp, et al.,

Appellant,

v.


Hugh Dereede, et al.

Respondent.

RESPONDENTS' MOTION TO EXTEND TIME TO PREPARE AND SERVE
RETURN TO PETITION FOR WRIT OF CERTIORARI

Respondent Hugh Dereede, by and through its undersigned counsel, moves for an extension of time through September 18, 2019, to prepare and serve Respondent's Return to Petition. Pursuant to South Carolina Supreme Court Order dated July 16, 2014, and in support of this motion, Counsel would show that he was served with the Petition on the first day of a 10-day vacation, and thereafter had an unexpected death in the family and a subsequent out-of-town conference to attend. As a result, Counsel for Respondent requires additional time to adequately prepare the Return.

Aug. 26, 2019
Rock Hill, South Carolina


Daniel J. Ballou, SC Bar No. 5935
Morton & Gettys, LLC
Attorneys for Respondent
P.O. Box 707
Rock Hill, SC 29731
T: 803.366.3457
F: 803.366.4044
dan.ballou@mortongettys.com

RECEIVED

AUG 28 2019

S.C. SUPREME COURT

Other Counsel of Record:

Desa Ballard

P.O. Box 6338

West Columbia, South Carolina 29171

Peter J. Nosal

852 Gold Hill Road; Suite 201

Fort Mill, South Carolina 29708

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable S. Jackson Kimball, III, Special Circuit Court Judge

Case No.: 2015-CP-46-01409
Appellate Case No. 2016-001921

Courtney Feeley Karp, et al.,

Appellant,

v.

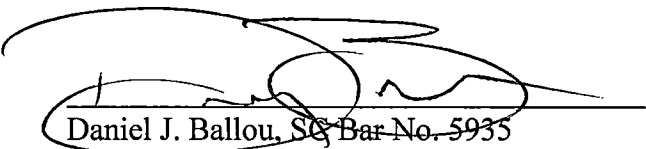
Hugh Dereede, et al.

Respondent.

PROOF OF SERVICE

The undersigned certifies that he has served this Motion for Extension of Time to File Respondent's Return to Petition for Writ of Certiorari by depositing a copy of it in the United States Mail, postage prepaid, on August 26, 2019, addressed to its attorney of record, Desa Ballard, P.O. Box 6338, West Columbia, South Carolina 29171 and Peter J. Nosal, 852 Gold Hill Road; Suite 201, Fort Mill, South Carolina 29708.

Aug 26, 2019
Rock Hill, South Carolina


Daniel J. Ballou, SC Bar No. 5935
Morton & Gettys, LLC
Attorney for Respondent
P.O. Box 707
Rock Hill, SC 29731
T: 803.366.3457
F: 803.366.4044
dan.ballou@mortongettys.com

RECEIVED

AUG 27 2019

SC Court of Appeals

RECEIVED

AUG 28 2019

S.C. SUPREME COURT