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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

RECEIVED
SEP 04 2019
SC Court of Appeals

Appellate Case No. 2019-000849

Louise Fishburne, Respondent,

v.

Lutheran Services for the Aging, Inc., Lutheran Family Services in the Carolinas, and Lutheran Services for the Aging, Inc. and Lutheran Family Services in the Carolinas d/b/a Lutheran Services Carolinas,Appellants.

RESPONDENT'S FIRST MOTION FOR AN EXTENSION

Respondent Louise Fishburne moves this Court for a thirty-day extension in which to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Respondent is currently due on Friday, September 6, 2019. This is Respondent's first request for an extension. Respondent respectfully requests an extension of thirty days, making the Initial Brief and Designation of Matter due on Monday, October 7, 2019.

September 3, 2019

Respectfully submitted,

Kathleen C. Barnes

Kathleen Chewning Barnes, SC Bar No. 78854
Barnes Law Firm, LLC
P.O. Box 897
Hampton, SC 29924
803-943-4529

Steven Murdaugh
P.O. Box 1164
Walterboro, SC 29488-0012
843-549-9544
Attorneys for Respondent

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PROOF OF SERVICE

The undersigned certifies that a copy of the *Notice of Appearance of Kathleen C. Barnes on Behalf of Respondent* and *Respondent's First Motion for Extension* has been served upon the following counsel of record by mailing one copy by United States Mail, addressed as shown below this 3rd day of September, 2019.

Patrick T. Morrissey
Clawson and Staubes, LLC
126 Seven Farms Dr., Ste. 200
Charleston, SC 29492-8144

Herbert W. Louthian, Jr.
P.O. Box 1299
Columbia, SC 29202-1299

September 3, 2019

Kathleen C. Barnes
Kathleen C. Barnes
P.O. Box 897
Hampton, SC 29924

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NOTICE OF APPEARANCE OF KATHLEEN C. BARNES ON BEHALF OF RESPONDENT

Kathleen C. Barnes, esquire, hereby enters a Notice of Appearance as co-counsel on behalf of Respondent Louise Fishburne in the above-captioned matter.

September 3, 2019

Respectfully submitted,

Kathleen C. Barnes

Kathleen Chewing Barnes, SC Bar No. 78854
Barnes Law Firm, LLC
P.O. Box 897
Hampton, SC 29924
803-943-4529

Steven Murdaugh
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Attorneys for Respondent

BARNES

LAW FIRM | LLC

Kathleen C. Barnes
Admitted: Georgia | South Carolina

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Via U.S. Mail

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

Re: *Louise Fishburne v. Lutheran Services for the Aging, Inc.*
Appellate Case No. 2019-000849

Dear Mrs. Kitchings:

Enclosed for filing please find the (1) original and one copy of the *Notice of Appearance of Kathleen C. Barnes on Behalf of Respondent*, and (2) the original and seven copies of *Respondent's First Motion for Extension* in the above-referenced case. Also enclosed is proof of service of the Notice and Motion, and a check in the amount of \$50.00 for the Motion filing fee. Please file the documents and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving counsel of record for the Appellants with a copy of the same.

If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,



Kathleen C. Barnes

Enclosures

cc: Patrick T. Morrisey
Herbert W. Louthian, Jr.
Steven Murdaugh (via email only)

BARNES

LAW FIRM I LLC

P.O. Box 897 • 13 Mulberry Street East
Hampton, SC 29924



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