

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Dorchester County
Court of Common Pleas
Maite Murphy, Circuit Court Judge

Case No. 2012-CP-18-02583
Appellate Case No. 2019-000644

RECEIVED
SEP 11 2019
SC Court of Appeals

Jennifer McFarland and Carlton Holcombe,

Appellants,

v.

Thomas Morris and David Hannemann,

Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE
INITIAL REPLY BRIEF OF APPELLANTS**

YOUNG CLEMENT RIVERS, LLP
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorney for Appellants

NOW COME Appellants, Jennifer McFarland and Carlton Holcombe, by and through their undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, and move for an extension of ten (10) days' additional time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal.

According to their proof of service, Respondents served their initial brief on August 22, 2019. Therefore, pursuant to Rule 208(a)(3), SCACR, Appellants have until today, September 3, 2019¹ to file their initial reply brief and corresponding designation of matter to be included in the record on appeal.

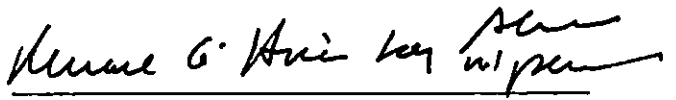
On account of work-related and other time commitments (including preparing for Hurricane Dorian), Appellants respectfully request that this deadline be extended by 10 days (from September 3, 2019), i.e., through September 13, 2019. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 10 days' time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial

¹ Calculating the 10-day period (from August 22, 2019) in accordance with Rule 263(a), SCACR, it runs until Tuesday, September 3, 2019, because the 10th day is Sunday, September 1, 2019 and the 11th day is Labor Day, September 2, 2019.

reply brief and designation of matter would be September 13, 2019, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorney for Appellants

Charleston, South Carolina

Dated: 9-3-2019

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PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorney for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on September 3, 2019, properly posted for delivery to the following addressees:

9 - RGH 9/9/19

Morgan S. Templeton
William W. Watkins, Jr.
John J. Dodds, IV
WALL TEMPLETON & HALDRUP, P.A.
P.O. Box 1200
Charleston, SC 29402

Attorneys for Respondents

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: *Russell G. Hines*
Russell G. Hines (SC Bar No. 72100)

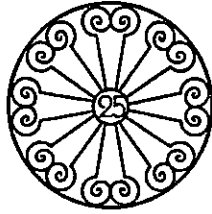
Attorney for Appellants

Charleston, South Carolina

Dated: 9-3-2019

PLEASE NOTE: The foregoing was originally taken to the post office on 9/3/19, but the post office was unexpectedly closed (and not accepting mail) because of Hurricane Dorian.

Russell G. Hines
Russell G. Hines 9/9/19



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

September 3, 2019

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SEP 11 2019

SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: William McFarland and Jennifer McFarland v. David K. Hannemann and Thomas O. Morris, Jr.
Case No.: 2015-CP-18-1524
YCR File: 15508-20150613

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return court-stamped copies of each to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

(all via US Mail and email)

Cc: Morgan S. Templeton, Esquire, Wall Templeton & Haldrup, P.A.
William W. Watkins, Jr., Esquire, Wall Templeton & Haldrup, P.A.
John J. Dodds, IV, Esquire, Wall Templeton & Haldrup, P.A.

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SC Court of Appeals

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YCRLAW 25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402-0993

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Jenny Abbott Kitchings, Clerk of
Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211