

THE STATE OF SOUTH CAROLINA
Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Eugene C. Griffith, Jr.

Common Pleas Number: 2018-CP-07-01449
Appeals Court Number: 19-00941

Floyd Hargrove.....Appellant.
v.
Anthony E. Griffis, Sr.,.....Respondent.

MOTION FOR AN EXTENSION OF TIME

Undersigned counsel moves this Court for an order granting Appellant an extension of time in which to file the initial brief and designation of matter in the above-captioned matter which are currently due on or before September 11, 2019.

This request is based upon undersigned counsel's work schedule and the effects of the Hurricane Dorian threat and evacuation. To begin, counsel has not previously requested an extension in this matter. Also, counsel has been inundated with federal appellate brief due dates within the last month, having filed a reply brief in the US v Ellis case on August 15, 2019; owing a joint appendix and supplemental brief, following *Anders* remand, in the US v Boston case due on September 16, 2019; and owing an opening brief and joint appendix in the US v Lewis matter due on September 25, 2019. All of these briefs were due prior to receipt of the transcript in the matter before this court.

Further, undersigned holds the durable power of attorney over an immediate family

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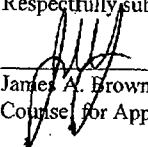
member who was moved to in-patient hospice at Beaufort Memorial Hospital on August 3, 2019. This family member is incompetent and unable to stand, walk, or communicate and requires 24 hour supervision.

As referenced above, the governor's evacuation order issued on September 1, 2019 forced the office closure from September 3-8, 2019 as the office's administrative staff had to care for her school aged children, the roads in Beaufort County were shut down for non-evacuation traffic and regulated by sheriff's deputies, and power was lost for more than 24 hours.

Undersigned counsel has attempted to discuss this matter with Respondent's co-counsel by leaving a phone message with the staff at his office on September 9, 2019.

In light of these circumstances, undersigned counsel requests that the Court extend the deadline for thirty days.

Respectfully submitted,


James A. Brown, Jr.
Counsel for Appellant

September 10, 2019
Beaufort, SC

Law Offices of Jim Brown, PA
1600 Burnside Street, Suite 100
PO Box 592
Beaufort, SC 29901
(843) 470-0003

THE STATE OF SOUTH CAROLINA
Court of Appeals

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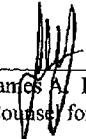
The Honorable Eugene C. Griffith, Jr.

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CERTIFICATE OF SERVICE

I certify that I have served copies of this Motion for an Extension of Time on the Respondent, by depositing copies of this Motion in the United States Mail, postage prepaid, on September 10, 2019, addressed to his attorneys of record, Anthony E Griffis, Sr., at Griffis Law Office, 355 Park Ave SW., Aiken, SC 29801, and Sean Michael Bolchoz, at Bolchoz Law Firm, PA PO Box 22650 Hilton Head Island, SC 29925-2560.



James A. Brown, Jr.
Counsel for the Appellant

September 10, 2019

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September 10, 2019

✓ The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina
Court of Appeals
P. O. Box 592
Columbia, SC 29211

Re: Hargrove v. Griffis; 18-CP-07-01449
Appeals Number: 19-00941

Ms. Kitchings:

Please see enclosed Motion for Extension of Time, Certificate of Service and a check for \$50 for filing fees for the above mentioned case. Please contact our office should you have any questions or concerns.

Sincerely,



Samantha Woodhouse
Law Offices of Jim Brown

cc: Sean Bolchoz
Anthony E. Griffis
Christopher Stephen Truluck
Floyd Hargrove

w/enclosure

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FAX COVER LETTER

Date: September 23, 2019

To: Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court

Fax: 803-734-1839

From: Samantha Woodhouse

Number of Pages: 6

Message: This will be going back out into the mail today.

CONFIDENTIAL AND PRIVILEGED COMMUNICATION: If you are not the intended recipient be advised that distribution of this message to you or by you is strictly prohibited. If you receive this communication in error, immediately notify us by telephone, (843) 470-0003, and return the original message to us at the above address.

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