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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

Appellate Case No. 2019-000849

**RECEIVED**  
OCT 07 2019  
SC Court of Appeals

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 SECOND 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. This is Respondent's second request for an extension, and no further extensions will be requested absent extraordinary circumstances. The Initial Brief of Respondent is currently due on Monday, October 7, 2019. Respondent respectfully requests an extension of thirty days, making the Initial Brief and Designation of Matter due on Wednesday, November 11, 2019.

October 3, 2019

Respectfully submitted,

*Kathleen C. Barnes*

Kathleen Cheuning 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*

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PROOF OF SERVICE

The undersigned certifies that a copy of *Respondent's Second 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 3<sup>rd</sup> day of October, 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

October 3, 2019



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

# BARNES

LAW FIRM | LLC

Kathleen C. Barnes

Admitted: Georgia | South Carolina

October 3, 2019

**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

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OCT 07 2019

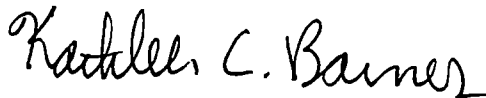
SC Court of Appeals

Dear Mrs. Kitchings:

Enclosed for filing please find the original and seven copies of *Respondent's Second Motion for Extension* in the above-referenced case. Also enclosed is proof of service of the 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 1 13 Mulberry Street East  
Hampton, SC 29924



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The Honorable Jenny Abbott Kitchings  
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