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

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

\_\_\_\_\_  
Case No. 2016-CP-18-1001  
\_\_\_\_\_

Tammy C. Richardson, Respondent,

v.

Halcyon Real Estate Services, LLP and McCabe, Trotter & Beverly, P.C.

Of whom McCabe, Trotter & Beverly, P.C. is the Appellant.

Appellate Case No. 2019-000671  
\_\_\_\_\_

**RESPONDENT'S MOTION FOR EXTENSION TO FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER**  
\_\_\_\_\_

WHEREAS Appellant's Brief and Designation of Matter for Inclusion in the Record on Appeal in this matter has been filed and counsel for Respondent needs an additional extension of time to file her initial brief as well as Designation of Matter to be Included in the Record on Appeal.

WHEREAS the trial of the case pending in Dorchester County was recently started but delayed due to a mistrial;

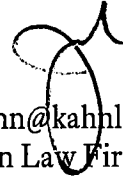
WHEREAS counsel is continuing efforts to resolve the case pending in Dorchester county prior to the scheduling of a new trial;

WHEREAS counsel for Appellant consents to an extension;

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Counsel for the Respondent hereby moves for an extension to allow Respondent to file her initial brief and Designation of Matter to be Included in the Record on Appeal in this matter no later than December 5, 2019.

Justin S. Kahn



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**Attorneys for Respondent**  
**Tammy C. Richardson**

Charleston, SC  
October 7, 2019

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

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

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**Case No. 2016-CP-18-1001**  
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Tammy C. Richardson, Respondent,

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**SC Court of Appeals**

v.

Halcyon Real Estate Services, LLP and McCabe, Trotter & Beverly, P.C.

Of whom McCabe, Trotter & Beverly, P.C. is the Appellant.

Appellate Case No. 2019-000671

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

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**Attorneys for Respondent  
Tammy C. Richardson**

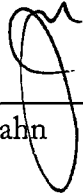
Charleston, SC  
October 7, 2019

I, Justin S. Kahn, do hereby affirm that on October 7, 2019, I served one copy of Respondent's Motion for Extension to File Initial Brief and Designation of Matter, on the following named individuals by placing a copy in the United States Mail, first class, postage prepaid to the following:

Robert P. Wood, Esq.  
Joshua R. Hinson, Esq.  
Rogers Townsend & Thomas, PC  
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Columbia, SC 29202  
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**Attorneys for Appellant  
McCabe Trotter & Beverly, P.C.**

  
Justin S. Kahn

**KAHN LAW FIRM, LLP**

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ELLIS I. KAHN\*<sup>^</sup>  
JUSTIN S. KAHN\*<sup>^</sup>  
WES B. ALLISON

October 7, 2019

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SC Court of Appeals

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

**Re: Tammy C. Richardson v. McCabe, Trotter & Beverly, P.C.**  
**Appellate Case No.: 2019-000671**

Dear Ms. Kitchings:

Enclosed for filing is an original and 7 copies of Respondent's Motion for Extension to File Initial Brief and Designation of Matter, along with Proof of Service. I have also enclosed a check for the filing fee. By copy of this letter I am serving this motion on counsel for Appellant.

Please file the original and six copies, mark the extra copy filed and return it to us in the enclosed, postage-prepaid envelope.

With best regards, I am

Sincerely,



Justin S. Kahn

JSK/pm  
Encl.

cc: M. Dawes Cooke, Jr., Esq.  
Robert P. Woods, Esq.  
Joshua R. Hinson, Esq.

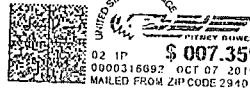


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FROM:

**KAHN LAW FIRM**  
562 SAVANNAH HWY.  
POST OFFICE BOX 31397  
CHARLESTON, S.C. 29417-1397

To:

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

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