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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM PICKENS COUNTY  
Edward W. Miller, Circuit Court Judge

Appellate Case No. 2018-001423  
Case No. 2017-CP-39-0428

**RECEIVED**  
NOV 06 2019  
SC Court of Appeals

John M. Burgess, ..... Appellant,

v.

Katherine C. Hunter, ..... Respondent.

**MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF OF RESPONDENT**

The Respondent Katherine C. Hunter respectfully moves this Court for an additional three-day extension of time until November 7, 2019, by which to file and serve her Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

The Respondent's motion is based on the following grounds:


1. The Respondent's Initial Brief is currently due to be filed and served on November 4, 2019.

2. The undersigned counsel for the Respondent fully intended to complete the preparation and drafting of the Initial Brief by the current deadline; however, because of other obligations and deadlines, the undersigned determined late on November 4th that he will need a brief additional extension to complete the drafting of the Initial Brief.

3. Counsel for the Appellant has been consulted and has consented to the requested extension through November 7, 2019. (See attached email).

WHEREFORE, the Respondent Katherine C. Hunter respectfully requests that they be allowed until November 7, 2019, by which to file and serve her Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN, DAVIS & HUGHES P.A.

BY:   
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
(803) 881-8920

*Counsel for Respondent Katherine C. Hunter*

November 4, 2019

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Appellate Case No. 2018-001423  
Case No. 2017-CP-39-0428

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John M. Burgess,.....

Appellant,

v.

Katherine C. Hunter,.....

Respondent.

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondent, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondent** in the above-captioned matter was made upon Appellant's counsel by placing copies in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 4th day of November 2019:

Stephen N. Garcia, Esquire  
Garcia Law, LLC  
604 Pettigru Street  
Greenville, South Carolina 29601



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**LINDEMANN  
DAVIS &  
HUGHES**

Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

November 4, 2019

**ANDREW F. LINDEMANN\***  
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\*Also Admitted in North Carolina  
†Certified Mediator

*Of Counsel*

**STEVEN R. SPREEUWERS**  
Direct Dial: (803) 373-2268  
Email: [steve@ldh-law.com](mailto:steve@ldh-law.com)

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

RE: John M. Burgess v. Katherine Hunter  
Appellate Case Number: 2018-001423  
Civil Action Number: 2017-CP-39-0428  
Claim Number: 21379503  
Our File Number: 307.20053

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Dear Ms. Kitchings:

Please find enclosed the original and one copy of the **Motion for Extension of Time to File Initial Brief of Respondent** in the above referenced matter. I would appreciate you filing the original and returning a clocked-in copy of each document to me in the enclosed envelope. By copy of this letter, I am serving copies on appellant's counsel. I am also enclosing my law firm's \$50 check for the filing fee.

If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/  
Enclosures

cc: (w/ Enclosures)

Stephen N. Garcia, Esquire  
Garcia Law, LLC  
604 Pettigru Street  
Greenville, South Carolina 29601



**LDH** LINDEMANN  
& DAVIS &  
HUGHES

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