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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court Of Common Pleas

Robert E. Hood, Circuit Court Judge

RECEIVED
NOV 07 2019
SC Court of Appeals

Case No. 2019-000624

Dottie R. Bell,

Appellant,

v.

John C. Bentley,

Respondent.

RESPONDENT'S SECOND MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF, DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AND PROOF OF SERVICE THEREOF AND TO HOLD FILING DEADLINE IN ABEYANCE UNTIL THE COURT ISSUES AN ORDER DECIDING THE MOTION OF THE MERITS

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Respondent John C. Bentley hereby moves for extension of time of thirty (30) days to file and serve its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof on the Appellant in the above-referenced case. To date, Respondent has requested one extension of time. Respondent files this motion seeking an additional extension due to the assigned attorney's involvement in multiple trials and additional time is needed. Counsel

therefore requests an additional thirty-day extension of time such that the respondent's initial brief and designation of matter, and proof of service are due on December 18, 2019.

Respectfully,

THIS IS THE 5 DAY OF NOVEMBER, 2019.



Carrie Hailman O'Brien
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ATTORNEYS FOR DEFENDANT

PROOF OF SERVICE

I certify that a copy of the foregoing RESPONDENT'S SECOND MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF, DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AND PROOF OF SERVICE was served upon all counsel of Record


- as an attachment to an electronic correspondence
- by depositing a copy of the same in an official depository of the United States mail in a postage-paid envelope
- via facsimile, or
- by hand delivery

addressed as follows:

T. Jeff Goodwyn, Jr., Esquire
Goodwyn Law Firm, LLC
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(803) 251-4517/(803) 251-4527 (F)
jgoodwyn@goodwynlaw.com
Attorney for Appellant

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This the 5 day of November, 2019.



Carrie Hallman O'Brien



WALKER ALLEN
TRIAL ATTORNEYS

Walker, Allen, Grice, Ammons & Foy, L.L.P.

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November 5, 2019

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Dottie R. Bell v. John C. Bentley
Case No.: 2019-000624

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Dear Sir or Madam:

Enclosed are the original and one copy of Respondent's Second Motion for Extension of Time in the above-captioned matter. Please file the original with the Court, and return the copy, stamped "filed," in the enclosed self-addressed, stamped envelope.

Thank you for your time and attention to this matter.

WALKER ALLEN GRICE AMMONS & FOY LLP

s/Carrie Hailman O'Brien

Carrie Hailman O'Brien

CHO/acw

Enclosures

cc: T. Jeff Goodwyn, Jr., *Attorney for Appellant*

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