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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2019-001599

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

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NOV 15 2019
SC Court of Appeals

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON
APPEAL OUT OF TIME

Ransome H. Helmly, SC Bar # 78081
Law Office of Ransome H. Helmly, LLC
409 Coleman Blvd., Ste. 200
Mt. Pleasant, SC 29464
Telephone: 843-884-0184
Email: rhh@hellylaw.com
Attorney for Appellant

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS:

COME NOW Appellant, Karen Kavanaugh, (hereinafter "Appellant"), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, move for leave to file/serve their Motion for Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record On Appeal (which is being conditionally filed/served contemporaneously herewith) out of time.

1. By letter of this Court dated November 7, 2019, counsel for Appellant was advised that the time for serving and filing Appellant's Initial Brief and Designation of Matter had expired.

2. The undersigned inadvertently overlooked this deadline.

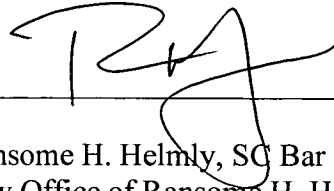
3. With apologies to the Court and opposing counsel for such inadvertence, the undersigned asks that Appellant's Motion be accepted for filing/service out of time.

4. The undersigned humbly submits that there is good cause to grant the requested relief given that the failure to meet the initial deadline for filing and serving Appellant's Initial Brief and Designation of Matters to be included in the Record on Appeal was inadvertent.

WHEREFORE, Appellant moves this Honorable Court to grant her leave to file/serve her Motion for Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record on Appeal out of time and ask that the Court

accept as duly filed/served the Motion conditionally filed/served contemporaneously herewith.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'RH', written over a horizontal line.

Ransome H. Helmly, SC Bar # 78081
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Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

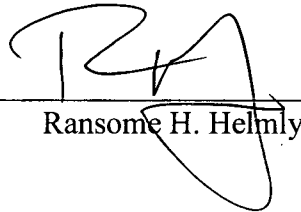
PROOF OF SERVICE

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Ransome H. Helmly, SC Bar # 78081
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Email: rhh@hellylaw.com
Attorney for Appellant

I, Ransome H. Helmly, on behalf of Appellant, hereby certify that a copy of the *Motion for Extension of Time to File and Serve Appellant's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matters to be Included in the Record on Appeal Out of Time* was sent all counsel of record on November 12, 2019, via United States Mail, postage pre-paid and addressed as follows:

William Kalivas, Esq.
Smith, Closser & Wheeler, PA
Post Office Box 40578
Charleston, SC 29423
843-760-0220
Attorney for Respondent



Ransome H. Helmly

Charleston, South Carolina

Dated: 11/12/19

LAW OFFICE OF
RANSOME H. HELMLY, LLC
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rhh@helmylaw.com

November 12, 2019

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SC Court of Appeals

Via US Mail & Facsimile

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

RE: Karyn Kavanaugh, Appellant v. New Age Contractors, LLP, Respondent
Case No. 2019-001599

Dear Ms. Kitchings:

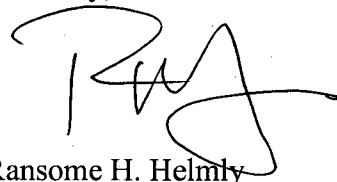
Enclosed for filing in connection with the above case, please find the following:

- The original and six (6) copies of Appellant's Motion to File Motion for Extension to File Initial Brief and Designation of Matters to be Included in the Record on Appeal Out of Time;
- The original and two (2) copies of a Proof of Service concerning same;
- Our firm check in the amount of \$50.00 to cover the cost of this motion;
- The original and six (6) copies of Appellant's Motion to File Initial Brief and Designation of Matters to be Included in the Record on Appeal;
- The original and two (2) copies of a Proof of Service concerning same; and
- Our firm check in the amount of \$50.00 to cover the cost of this motion;

Kindly return one clocked copy of each filing to us in the self-addressed stamped envelope provided. Thank you, in advance, for your assistance with this matter.

With kindest regards, I am

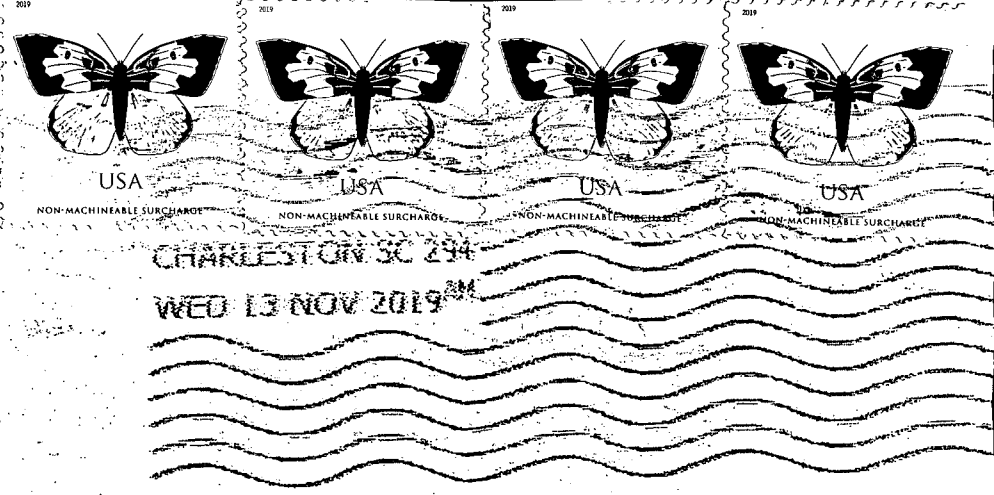
Sincerely,



Ransome H. Helmy
Attorney for Appellant

cc: William Kalivas, Esq.

Office of Ransome H. Helmly, LLC
409 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464



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