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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

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Case No. 2019-01599

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New Age Contractors, LLP, Respondent,  
v.  
Karyn Cavanaugh, Appellant.

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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

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

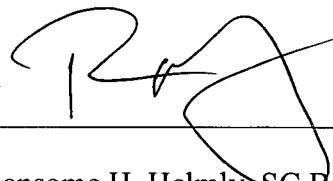
**RECEIVED**  
NOV 15 2019  
SC Court of Appeals

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

Pursuant to Rule 263(b), SCACR, Appellant, Karen Kavanaugh, (hereinafter "Appellant"), hereby moves for a 30-day extension of time in which to file and serve Appellant's Initial Brief and Designation of Matters in connection with the above-referenced matter. The requested extension is necessary because Plaintiff's counsel has numerous other deadlines falling on or close to the existing briefing deadline of November 15, 2019. Further, William Kalivas, Esquire, counsel for Respondent, has been consulted about this motion and has no objection hereto.

WHEREFORE, Appellant respectfully submits good cause exists for the granting of this motion, and request that the Court issue an Order granting her thirty (30) additional days in which to file and serve her Initial Brief and Designation of Matters to be Included in the Record on Appeal. With the requested extension, Appellant's Initial Brief and Designation of Matters to be Included in the Record on Appeal will be due on December 18, 2019.

Respectfully submitted,



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

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

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Case No. 2018-CP-10-4907

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New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

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PROOF OF SERVICE

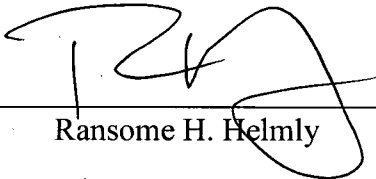
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Attorney for Appellant

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I, Ransome H. Helmly, on behalf of Appellant, hereby certify that a copy of the *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* 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  
409 COLEMAN BLVD., SUITE 200  
MT. PLEASANT, SC 29464  
P: 843-884-0184  
F: 843-284-9871  
rhh@helmylaw.com

November 12, 2019

**RECEIVED**  
NOV 15 2019  
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:

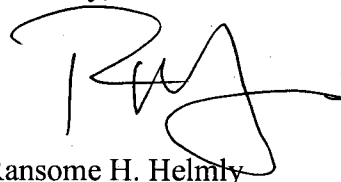
Enclosed for filing in connection with the above case, please find the following:

- 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

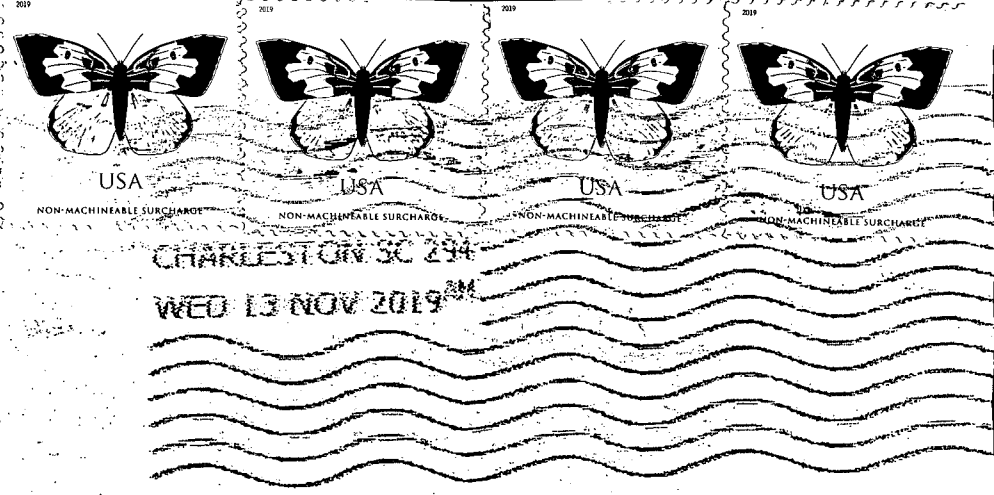
Sincerely,



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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