

9/14/16

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

RECEIVED
NOV 19 2019
SC Court of Appeals

Civil Action No.: 2017-CP-26-08135
Appellate Case No.: 2019-001076

Jesse Cook, Respondent,

vs.

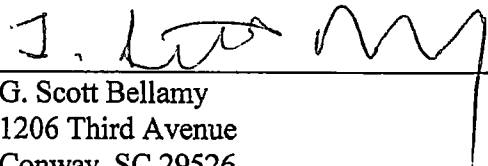
Edward Jenerette, Appellant.

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

Pursuant to Rule 263(b), SCACR, Respondent, Jesse Cook, moves before the Court for an additional extension of time to file and serve the Initial Respondent's Brief and Designation of Matter to be included in the Record on Appeal which is currently due November 20, 2019. Respondent's attorney respectfully requests the Court extend the date for an additional fifteen (15) days due to the fact that he recently retained George M. Hearn with the law firm of Hearn & Hearn, P.A., to assist Respondent in the defense of this appeal, and Mr. Hearn has not had sufficient time to properly examine the file including the transcript and the court documents filed in this action, and to properly perform the legal research necessary to prepare Respondent's Initial Brief and Designation of Matter to be

Included in the Record on Appeal. Respondent's attorney is very cognizant of the fact the Court in its Order filed October 21, 2019, stated no further extensions would be granted absent extraordinary circumstances, and Respondent's attorney would respectfully request the Court determine that such circumstances exist and grant his Motion. No additional extensions will be sought by Respondent's attorney in this appeal.

Respectfully submitted this 18 day of November, 2019.

A handwritten signature in black ink, appearing to read "G. Scott Bellamy", written over a horizontal line.

G. Scott Bellamy
1206 Third Avenue
Conway, SC 29526
Telephone: 843-248-3172
Sbellamy@sccoast.net
ATTORNEY FOR RESPONDENT

November 18, 2019

TRANSMITTED VIA FACSIMILE (803-734-1839)
AND FIRST-CLASS MAIL

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
NOV 19 2019
SC Court of Appeals

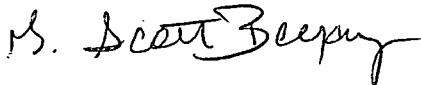
RE:

Dear Ms. Kitchings:

Enclosed are the original and six copies of my Motion for Extension wherein I am requesting an additional fifteen (15) days in which to prepare the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal in the above-referenced matter. Also enclosed is the original Certificate of Service by mail and our firm check in the amount of \$50.00. I have recently associated George M. Hearn of the firm of Hearn & Hearn to assist me in the preparation of the Brief and Designation of Matter. Mr. Hearn has not had sufficient time to properly examine the file including the transcript and the court documents filed in this action, and to properly perform the legal research necessary to prepare Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal. I realize in the Court's Order dated October 21 that no further extension would be granted absent extraordinary circumstances and I would respectfully request the Court determine that such circumstances exist and grant my Motion. No additional extensions will be sought by Respondent's attorney.

I am providing opposing counsel with a copy of this transmittal and the underlying Motion.

Sincerely yours,



G. Scott Bellamy

GSB/tc

cc: (opposing counsel)

