

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

Hon. Alex Kinlaw, Jr., Circuit Court Judge

*Case No. 2015-CP-10-2191
App. Case No. 2019-001403*

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NOV 20 2019
SC Court of Appeals

Karrie Gurwood & Howard Gurwood.....Appellants

v.

**GCA Services Group, Inc. & GCA Services
Group of North Carolina, Inc.....Respondents.**

**REQUEST FOR AN EXTENSION OF TIME
TO FILE APPELLANT'S INITIAL BRIEF & DESIGNATION OF
MATTERS TO BE INCLUDED IN THE
RECORD ON APPEAL**

COMES NOW, the Appellants, Karrie and Howard Gurwood, respectfully moving before this honorable Court for an extension to serve and file the parties' Briefs and Designations of Matter to be Included in the Record on Appeal as the Appellants. Appellants' request is based upon the following: (1) Appellants' Counsel has long standing international travel plans with family from November 19, 2019 to December 2, 2019, further, (2) Appellants' counsel is currently on the jury trial roster for the weeks of December 2, December 9, and December 16th in various counties; finally, the Hanukah and Christmas holidays occur thereafter. In light of the foregoing personal and professional obligations, Appellants respectfully request a sixty (60) day extension to file the above-referenced documents with this Court.

Appellants have conferred with Counsel for the Respondents, who have consented to such an extension. Appellants have not styled this Request as a "Joint" or "Consent" request as the document does not contain the signature of Counsel for the Respondent, however, Appellants have communicated via email regarding the agreement and have memorialized same in email correspondence with Counsel for the Respondent. (A copy of which is attached hereto as "Exhibit A" and incorporated by reference herein.)

WHEREFORE, based upon the foregoing the Appellants would at this time respectfully and humbly pray this honorable Court for an Order extending the time in which to serve and file the parties' briefs and Designations of Matter to be Included in the Record on Appeal along with any other such further relief as this Court may deem just and proper.

Respectfully submitted this 20th day of November, 2019.

By: 

Daniel B. Slotchiver, Esquire

S.C. Bar No.: 15129

Andrew J. McCumber, Esquire

S.C. Bar No.: 101559

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*Admitted *pro hac vice*

COUNSEL FOR THE PLAINTIFFS/APPELLANTS



Susan Mauldin <paralegal@slotchiverlaw.com>

Re: Gurwood Appeal

1 message

Robert Lyles <rtl@lylesfirm.com>
To: Andrew J McCumber <andrew@slotchiverlaw.com>
Cc: Susan Mauldin <paralegal@slotchiverlaw.com>

Tue, Nov 19, 2019 at 2:29 PM

No problem.

Sent from my iPhone

> On Nov 19, 2019, at 2:28 PM, Andrew J McCumber <andrew@slotchiverlaw.com> wrote:

>
> Robert,
>
> Sorry to bug you, I tried calling office earlier. I wanted to see if you had any objection to / could sent to us requesting an extension for time to file Appellant's Brief and DOM? I'm headed out of the country later today, so would like to get the motion prepared before I leave.

>
> Thanks in advance,

>
> Best regards,

> AJM,

> -

>
> _____
> Andrew J. McCumber, Esq.
> Litigation Associate
> Slotchiver & Slotchiver, LLP
> 751 Johnnie Dodds Blvd, Suite 100
> Mount Pleasant, SC 29464
> Direct: (843) 628-7031
> Main: (843) 577-6531
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>
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EXHIBIT**A**

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Case No. 2015-CP-10-2191
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Karrie Gurwood & Howard Gurwood *Appellants*


v.

**GCA Services Group, Inc. & GCA Services
Group of North Carolina, Inc.** *Respondents.*

AFFIDAVIT OF SERVICE

The undersigned certifies that the Request for an Extension of Time was served upon the Respondents on this 20th day of November, 2019 by U.S. Mail to the following:

**Robert T. Lyles, Jr., Esquire
Marcus T. Griffin, Esquire
Lyles & Associates
342 East Bay Street
Charleston, SC 29401**



**Daniel S. Slotchiver, Esq.
Andrew J. McCumber, Esq.
Donald R. McGarrah, Esquire*
COUNSEL FOR THE APPELLANTS**

SLOTCHIVER & SLOTCHIVER, L.L.P.
ATTORNEYS AT LAW
EST. 1959

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MOUNT PLEASANT, SC 29464

TELEPHONE (843) 577-6531
FACSIMILE (843) 577-0261

November 20, 2019

VIA REGULAR MAIL AND FACSIMILE

THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK, SOUTH CAROLINA COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
(803) 734-1839

RE: Karrie Gurwood & Howard Gurwood v. GCA Services Group, Inc. & GCA Services Group of North Carolina, Inc.

Appellate Case No.: 2019-001403

Case No.: 2015-CP-10-2191

Our File No.: 2019-AP-002

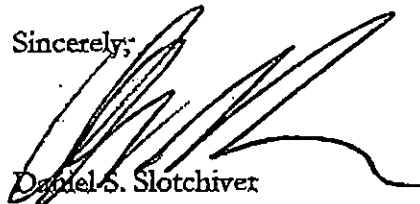
Dear Ms. Kitchings:

Enclosed you will please find one (1) copy of a Request for Extension of Time in which to file the Appellants' Initial Brief and Designation of Matter, along with a check for Fifty (\$50.00) Dollars from our firm's escrow account for the filing fees associated with same.

Please note that I have copied all counsel of record to this correspondence pursuant the South Carolina Appellate Rules.

I thank you in advance for your time and attention to this matter, please do not hesitate to contact me if you should have any questions regarding this correspondence or the matters addressed herein.

Sincerely,



Daniel S. Slotchiver

DSS/scm

Enclosure(s) as stated.

cc: Robert T. Lyles, Esq., Attorney for Respondents

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SC Court of Appeals

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Fax Cover Sheet

TO:	The Honorable Jenny Abbott Kitchens (803) -734-1839
FROM:	Andrew J. McCumber, Esquire
DATE:	November 20, 2019
RE:	Appellate Case No.: 2019-001403
# OF PAGES, INCLUDING COVER SHEET	6

Please see attached. Original is being sent by mail today, along with filing fee.

Thank you in advance.

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NOV 20 2019

SC Court of Appeals

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