

9/15/13

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
First Judicial Circuit

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2019-001065  
Dorchester County Case Nos. 2019-CP-18-0677 and 2017-CP-18-1816

**RECEIVED**  
DEC 02 2019  
SC Court of Appeals

In Re: The Estate of Doris Duane Colucci,

Michael C. Fox, Named Personal Representative in the Last  
Will of Doris Duane Colucci .....

v.

Andrew W. Chandler, Esquire, in his capacity as Special  
Administrator of the Estate of Doris Duane Colucci,  
Michael C. Fox, Successor Trustee of the Colucci Living Trust,  
Dated February 24, 2005, Michael Frederick Antonio Colucci, John Martin Antonio,  
Henry Burkes, and Richard M. Hyman, Jr., Esquire ..... Respondents.

**RESPONDENT CHANDLER'S MOTION TO EXTEND TIME  
TO FILE RESPONDENT'S INITIAL BRIEF**

Pursuant to the South Carolina Court of Appeals Rules, Respondent Andrew Chandler, by  
and through its undersigned counsel, hereby move the Court for an order granting Respondent  
Chandler a thirty (30) day extension of time, until December 27, 2019, in which to file and serve  
Respondent Chandler's Initial Brief. Respondent Chandler would submit that this extension is  
necessary due to counsel's current case load. This deadline has not previously been extended.



Elizabeth J. Palmer  
Rosen Hagood, LLC  
P.O. Box 893  
Charleston, SC 29402  
(843) 577-6726  
ATTORNEY FOR RESPONDENT  
ANDREW W. CHANDLER

November 27, 2019

Other Counsel of Record:

Gordon H. Garrett, Esquire  
Garrett Law Offices, LLC  
1075 E Montague Ave.  
North Charleston, SC 29405

ATTORNEY FOR APPELLANT

Angus Lawton, Esquire  
Lawton Law Firm, LLC  
496 Bramson Court #100  
Mt. Pleasant, SC 29464

ATTORNEY FOR RESPONDENTS MICHAEL COLUCCI AND JOHN MARTIN ANTONIO

Adam Mlynarczyk, Esquire  
Koontz Mlynarczyk LLC  
1058 East Montague Avenue  
North Charleston, SC 29405

ATTORNEY FOR RESPONDENT HENRY BURKES

M. Richardson Hyman, Jr.  
P.O. Box 127  
Charleston, SC 29402

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Henry Burkes, and Richard M. Hyman, Jr., Esquire ..... Respondents.

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**PROOF OF SERVICE**

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I do hereby certify that on November 27, 2019, I have served all counsel in this action with a copy of the documents herein below specified by mailing a copy of the same by United States mail, postage prepaid, and facsimile to the following address:

Documents:           **Respondent Andrew Chandler's Motion to Extend Time to File Initial Brief**

Counsel Served:

Gordon H. Garrett, Esquire  
Garrett Law Offices, LLC  
1075 E Montague Ave.  
North Charleston, SC 29405

Angus Lawton, Esquire  
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496 Bramson Court #100  
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Charleston, SC 29401  
(843) 577-6726  
ATTORNEY FOR  
RESPONDENT CHANDLER

# ROSEN | HAGOOD

Elizabeth J. Palmer  
epalmer@rosenhagood.com

November 27, 2019

**VIA FACSIMILE & U.S. MAIL**

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

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DEC 02 2019  
SC Court of Appeals

Re: In Re: The Estate of Doris Duane Colucci  
Michael C. Fox v. Andrew W. Chandler et al.  
Appellate Case No.: 2019-001065

Dear Ms. Kitchings:

Enclosed please find an original and six copies of the Respondent Chandler's Motion to Extend Time to File Respondent Chandler's Initial Brief and Proof of Service in the above referenced matter. Also enclosed is our firm's check in the amount of \$50.00 for the filing fee. Please file the original with the Court and return a clocked copy to me in the enclosed self-addressed, stamped envelope provided. I have also filed this motion via electronic facsimile pursuant to SCACR Rule 262(a)(2).

Sincerely yours,



Elizabeth J. Palmer

EJP/tnd

Enclosures

cc: Gordon H. Garrett, Esquire  
Angus Lawton, Esquire  
Adam Mlynarczyk, Esquire  
M. Richardson Hyman, Jr.



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151 Meeting Street, Suite 400  
 Charleston, South Carolina 29401

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