

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. 2019-01599

RECEIVED  
DEC 18 2019  
SC Court of Appeals

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

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

COMES NOW Appellant Karyn Cavanaugh, by and through undersigned  
counsel, and hereby moves this Court, pursuant to Rules 240 & 263(b), SCACR,  
for an extension of time for fifteen (15) days to file the Initial Brief and the Initial  
Designations of Matter to be included in the Record on Appeal in this action. In  
support hereof, the undersigned states the following:

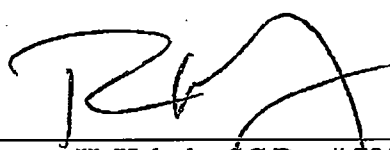
1. The current deadline is December 18, 2019.
2. Counsel for the Appellant is a solo practitioner who relies heavily  
on his paralegal. Counsel's paralegal has been ill and unable to work for nearly

two weeks and just today tested positive for the flu. As a result, counsel is temporarily unable to operate at the same capacity and thus needs additional time in this matter.

3. The Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.

WHEREFORE, Appellant respectfully submits good cause exists for the granting of this motion, and request that the Court issue an Order granting her fifteen (15) 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 January 2.

Respectfully,



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

December 18, 2019  
Mount Pleasant, South Carolina

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

DEC 18 2019  
SC Court of Appeals

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907

New Age Contractors, LLP,

Respondent,

v.

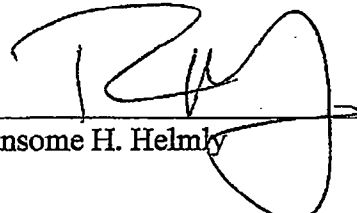
Karyn Cavanaugh,

Appellant.

PROOF OF SERVICE

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 December 18, 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

Mount Pleasant, South Carolina

Dated: 12/18/19

LAW OFFICE OF  
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409 COLEMAN BLVD., SUITE 200  
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P: 843-884-0184  
F: 843-284-9871  
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December 18, 2019

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DEC 18 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 for Second Extension 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. Helmly  
Attorney for Appellant

cc: William Kalivas, Esq.

RECEIVED

DEC 18 2019

**FAX**

Date: 12/18/2019 Court of Appeals

Pages including cover sheet: 6

<b>To:</b>	18037341839@rcfax.com
<b>Phone</b>	
<b>Fax Phone</b>	(803) 734-1839

<b>From:</b>	Randy Helmly
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**NOTE:**

2019-001599