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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS

Daniel E. Van Slambrook, Circuit Court Judge

Case No. 2004-CP-08-1855

Belinda Fox and Gerry Fox,
Petitioners-Appellants,

v.

Ronald E. Price and Diana R. B. Price,
Respondents-Appellees.

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DEC 23 2019
SC Court of Appeals

MOTION TO EXTEND TIME

December 19, 2019

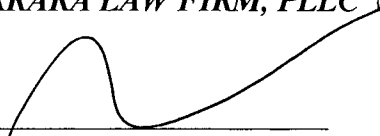
Paul B. Ferrara, III
S.C. Bar No. 70511
8887 Old University Blvd. Ste.200
North Charleston, SC 29406
(843) 569-5511
Attorney for Appellants

For good cause shown, Petitioners, Belinda Fox and Gerry Fox, by and through their attorney, Paul B. Ferrara, III hereby would respectfully ask this court for thirty (30) day extension of time to file the initial brief and designation of matter to be included on appeal. Counsel respectfully requests the Court extend the date for an additional thirty (30) days due to the holiday, volume of counsel's caseload, trial schedule, and recent staff changes. The original deadline is December 23, 2019 and granting this motion would make the new deadline January 22, 2020.

Attorney Paul B. Ferrara, III, has contacted the Respondents' attorney, Derrick Jackson via electronic mail and he has consented to an extension of time.

WHEREFORE, Petitioners respectfully pray that this Honorable Court enter an Order allowing an additional thirty (30) days to file the initial brief of Appellant and designation of matter to be included on appeal, making the new deadline January 22, 2020.

Respectfully Submitted,
FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III
8887 Old University Blvd. Ste.200
North Charleston, SC 29406
S.C. Bar 70511
(843) 569-5511
(843) 569-5411 Fax
Attorney for Appellants

December 19, 2019

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Ronald E. Price and Diana R.B. Price,

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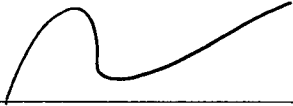
Belinda Fox and Gerry Fox,

Appellants.

PROOF OF SERVICE

I, the undersigned counsel, hereby certify that I have served the Appellant's letter requesting a Motion to Extend Time upon the Respondents, Ronald E. Price and Diana R. B. Price, by depositing a copy of the same in the United States Mail, postage prepaid, on December 19, 2019, addressed to their attorney of record, James Derrick Jackson, Esquire, Tobias G. Ward, Jr. P.A., P.O. Box 50124 Columbia, SC 29250.

Respectfully submitted this 19th day of December 2019.



Paul B. Ferrara, III
SC Bar No. 70511
8887 University Blvd. Ste.200
North Charleston, SC 29406
(843) 569-5511 / (843) 569-5411 fax
paul@ferraralawfirm.net
Attorney for Appellants

Ferrara Law Firm, PLLC

8887 Old University Blvd. Ste. 200
North Charleston, SC 29406
(843) 569-5511 / Fax (843) 569-5411

Paul B. Ferrara, III*
Janel K. Ferrara*

*(also Admitted in N.C.)

December 19, 2019

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DEC 23 2019

SC Court of Appeals

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

Re: Ronald E. Price and Diana R.B. Price v. Belinda Fox and Gerry Fox
Appellate Case No.: 2019-01379
Our File No.: 15-614

Dear Ms. Kitchings:

Please accept this motion to extend time to file the intial brief and designation of matter to be included in the record on appeal.

I have enclosed is a proof of service regarding the same. I have enclosed a check representing the motion fee.

Please file the original and return a clocked copy to our office in the self-addressed, stamped envelope which is enclosed.

Sincerely,

FERRARA LAW FIRM, PLLC


Paul B. Ferrara, III

Enclosures

cc: J. Derrick Jackson
Tobias G. Ward, Jr. PA
Post Office Box 50124
Columbia, SC 29250
Attorney for Respondents

errara Law Firm, PLLC
887 Old University BLVD. STE 201
North Charleston SC 29406



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The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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Columbia SC 29211-1629

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