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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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DEC 23 2019

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

SC Court of Appeals

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2018-001423

Case No.: 2017-CP-39-0428

John M. Burgess Appellant,

v.

Katherine Hunter Respondent.

**MOTION FOR EXTENSION OF TIME TO
FILE FINAL BRIEF OF APPELLANT**

The Appellant, John M. Burgess, respectfully moves this Court for a 21-day extension of time until January 20, 2020, by which to file and serve his Final Brief. The Appellant's motion is based on the following grounds:

1. The Appellant's Final Brief is due to be filed and served on December 29, 2019.
2. The undersigned counsel for the Appellant will be out of town with family over the next several weeks on a previously unplanned vacation that will prevent him from completing the Final Brief by the December 29, 2019 deadline.

3. Counsel for the Respondent has been consulted and has consented to the requested extension through January 20, 2020.

WHEREFORE, the Appellant, John M. Burgess, respectfully requests that they be allowed until January 20, 2019, by which to file and serve his Final Brief.

Garcia Law, LLC

/s/ Stephen N. Garcia
Stephen N. Garcia
604 Pettigru Street
Greenville, SC 29601
Dial: (864) 271-7335
Fax: (864) 271-7338

Attorney for Appellant

December 19, 2019

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John M. Burgess Appellant,

v.

Katherine Hunter Respondent.

CERTIFICATE OF SERVICE

I certify that I have served the **Motion for Extension of Time to File Final Brief** on Katherine Hunter by depositing a copy of it in the United States Mail, postage prepaid, on December 19, 2019, addressed to her attorney of record, Andrew F. Lindemann, P.O. Box 6923, Columbia, SC 29260.

December 19, 2019

Garcia Law, LLC

/s/ Stephen N. Garcia

Stephen N. Garcia
604 Pettigru Street
Greenville, SC 29601
Dial: (864) 271-7335
Fax: (864) 271-7338

Attorney for Appellant



December 19, 2019

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk for the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211
Fax: (803) 734-1839

**Re: John M. Burgess v. Katherine Hunter,
Appellate Case Number: 2018-001423
Civil Action Number: 2017-CP-39-0428**

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Dear Ms. Kitchings:

Enclosed, please find the of Appellants Motion for Extension of Time to File Final Brief in the above referenced matter. By copy of this letter, I am serving a copy on the Respondent's Counsel. I am also enclosing my law firm's check for the filing fee of \$50.00.

Thank you for your time and effort.

Sincerely,

GARCIA LAW LLC

Stephen N. Garcia
Attorney for John M. Burgess, Appellant

SNG/cpg
Encls.

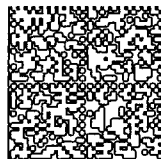
CC: Andrew F. Lindemann, Esquire (w/ encl)



**GARCIA
LAW LLC**

GREENVILLE, SOUTH CAROLINA
604 PETTIGRU STREET, GREENVILLE, SC 29601

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The Honorable Jenny Abbott Kitchings
Clerk for the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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