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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM EDGEFIELD COUNTY  
Court of Common Pleas

Alison Renee Lee, Chief Administrative Circuit Court Judge

Appellate Case No.: 2019-001428

RECEIVED  
JAN 06 2020  
SC Court of Appeals

Rufus L. Griffin, pro se

Appellant

v.

Thomas Mosley, Quinnie Mosley,  
Walter Mosley, Timothy Mosley, and  
Paquita Mosley, Individually and as  
Personal Representative of the Estate  
of Ellec Mosley,

Respondents

**RESPONDENT'S MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent Paquita Mosley, respectfully requests a forty-nine (49) day extension of time to file a response to Appellant's pending Motion to Vacate an Order in this case.

The office of Respondent's legal counsel was closed for the holidays and reopened today, January 6, 2020; however, Respondent, now and hereafter through her legal counsel, did check the office mail on January 3, 2020. At that time she received service of and first had notice of Appellant's pending motion.

During January of each year, Respondent's legal counsel routinely performs an intense file review. This review also includes updates to office procedures and the

closing of physical files and archival of case and trust data of cases disposed of in the previous year. Respondent's attorney's schedule is such that she needs the month of January to finish these important tasks.

While Respondent makes no objection to Appellant's request for an extension of time, Appellant files this motion requesting additional time to respond to Respondent's pending motion so she may complete the scheduled file review.

Appellant's motion, which includes approximately ninety-four (94) pages of which thirty-one (31) pages are argument and sixty-three (63) pages are exhibits.

Respondent's impression of Appellant's motion is that it appears to be more in line with a brief, if not essentially a pro se brief, and as such requires more time for Respondent to prepare a response than is allotted for a motion.

For these reasons, Respondent requests this Court enter an order extending the deadline until Monday, February 24, 2020, for Respondent to file a response to Appellant's pending Motion to Vacate an Order. Respondent also requests the current deadline be held in abeyance while the Court considers this request.

Respectfully Submitted,



Columbia, South Carolina

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**CERTIFICATE OF SERVICE**

**Dear Clerk: Please file this Certificate of Service and any other enclosed documents, then conform and clock any copies inside of the self-addressed, stamped envelope for return to me.**

I did transmit the following document(s) in the manner described below:

Date: **January 6, 2020**

Enclosed: **Respondent's Motion for Extension of Time**

**HAND DELIVERY:**

S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**ORIGINAL**

**VIA US MAIL:**

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313 Fifth Avenue  
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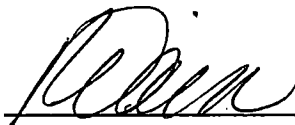
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Thanking you in advance,



Columbia, South Carolina

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