

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

**RECEIVED**

**APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas**

**JAN 08 2020**

**SC Court of Appeals**

*Hon. Alex Kinlaw, Jr., Circuit Court Judge*

*Case No. 2015-CP-10-2191*  
**App. Case No. 2019-001403**

**Karrie Gurwood & Howard Gurwood**.....*Appellants*

v.

**GCA Services Group, Inc. & GCA Services  
Group of North Carolina, Inc.**.....*Respondents.*

**SECOND REQUEST FOR AN EXTENSION OF TIME  
TO FILE APPELLANT'S INITIAL BRIEF & DESIGNATION OF  
MATTERS TO BE INCLUDED IN THE  
RECORD ON APPEAL**

**COMES NOW**, the Appellants, Karrie and Howard Gurwood, respectfully moving before this honorable Court for an extension to serve and file the parties' Briefs and Designations of Matter to be Included in the Record on Appeal as the Appellants. Appellants' previously requested this Court for a sixty (60) day extension based upon the following: (1) Appellants' Counsel had long standing international travel plans with family from November 19, 2019 to December 2, 2019, further, (2) Appellants' counsel on jury trial rosters for the weeks of December 2, December 9, and December 16th in various counties; and also the Hanukah, Christmas and New Years holidays occurring thereafter. Since the submission of Appellant's last request, Appellant Appellants' Counsel was also on the jury roster in Charleston County for January 6, 2019 and January 13, 2019 in a separate matter

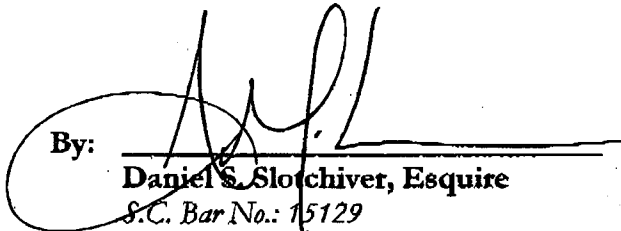
in Anderson counties, thus further hindering Appellant's ability to prepare the Appellate Court filings. Finally, this Court issued an opinion on another matter (Case No. 2017-00196) currently pending before this Court on or about December 31, 2019. Appellant's Counsel must now prepare a petition for rehearing on that matter, and the due date for same also falls on January 13, 2020. Accordingly, Appellant respectfully requests under these exigent circumstances for a final extension of thirty days to file the Initial Brief and Designation of Matters.

Appellants have conferred with Counsel for the Respondents, who have consented to such an extension. Appellants have not styled this Request as a "Joint" or "Consent" request as the document does not contain the signature of Counsel for the Respondent, however, Appellants have communicated via email regarding the agreement and have memorialized same in email correspondence with Counsel for the Respondent. (A copy of which is attached hereto as "**Exhibit A**" and incorporated by reference herein.)

**WHEREFORE**, based upon the foregoing the Appellants would at this time respectfully and humbly pray this honorable Court for an Order extending the time in which to serve and file the parties' briefs and Designations of Matter to be Included in the Record on Appeal along with any other such further relief as this Court may deem just and proper.

Respectfully submitted this 8th day of **January, 2020**.

*(signatures contained on the following page)*

By: 

**Daniel S. Slotchiver, Esquire**

*S.C. Bar No.: 15129*

**Andrew J. McCumber, Esquire**

*S.C. Bar No.: 101559*

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*\*Admitted pro hac vice*

**COUNSEL FOR THE PLAINTIFFS/APPELLANTS**

**THE STATE OF SOUTH CAROLINA  
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**APPEAL FROM CHARLESTON COUNTY  
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**Karrie Gurwood & Howard Gurwood.....Appellants**

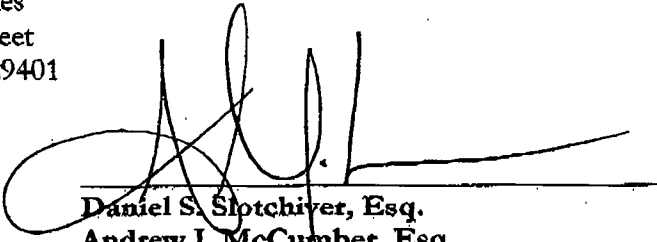
v.

**GCA Services Group, Inc. & GCA Services  
Group of North Carolina, Inc. .... Respondents.**

**AFFIDAVIT OF SERVICE**

The undersigned certifies that the Request for an Extension of Time was served upon the Respondents on this 8th day of January, 2020 by U.S. Mail to the following:

**Robert T. Lyles, Jr., Esquire  
Marcus T. Griffin, Esquire  
Lyles & Associates  
342 East Bay Street  
Charleston, SC 29401**



**Daniel S. Slotchiver, Esq.  
Andrew J. McCumber, Esq.  
Donald R. McGarran, Esquire\*  
COUNSEL FOR THE APPELLANTS**



Andrew J McCumber &lt;andrew@slotchiverlaw.com&gt;

**Re: Gurwood Appeal**

1 message

Robert Lyles &lt;rtl@lylesfirm.com&gt;

Wed, Jan 8, 2020 at 3:14 PM

To: Andrew J McCumber &lt;andrew@slotchiverlaw.com&gt;

I consent

Sent from my iPhone

On Jan 8, 2020, at 2:39 PM, Andrew J McCumber &lt;andrew@slotchiverlaw.com&gt; wrote:

Robert,

Do you have any objection to me requesting one more extension on the appeal? In addition to the three rosters I was on in December, I also got placed on one this week in Charleston, and next week in Anderson County. To top it off, I just received an opinion from the COA on a separate case, filed on 12/31/19, meaning the deadline for the Petition for Rehearing on that matter also falls on 1/13/20.

I'm concerned about being able to finish Gurwood Briefs, prepare for a three-plus day trial, and also prepare a Petition for Rehearing on the other appellate case. Please advise at your earliest convenience whether you are amenable to such a request.

Thanks, and hope your new year is off to a good start.

Cheers,  
AJM

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**Andrew J. McCumber, Esq.**  
*Litigation Associate*  
**Slotchiver & Slotchiver, LLP**  
751 Johnnie Dodds Blvd, Suite 100  
Mount Pleasant, SC 29464  
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**EXHIBIT**  
A

**SLOTCHIVER & SLOTCHIVER, L.L.P.**  
ATTORNEYS AT LAW  
EST. 1959

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DANIEL S. SLOTCHIVER  
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January 8, 2020

VIA REGULAR MAIL AND FACSIMILE  
THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK, SOUTH CAROLINA COURT OF APPEALS  
POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
(803) 734-1839

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JAN 08 2020  
SC Court of Appeals

**RE: Karrie Gurwood & Howard Gurwood v. GCA Services Group, Inc. & GCA Services Group of North Carolina, Inc.**  
**Appellate Case No.: 2019-001403**  
**Case No.: 2015-CP-10-2191**  
**Our File No.: 2019-AP-002**

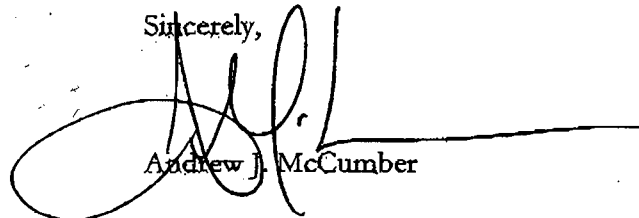
Dear Ms. Kitchings:

Enclosed you will please find one (1) copy of a Request for Extension of Time in which to file the Appellants' Initial Brief and Designation of Matter, along with a check for Fifty (\$50.00) Dollars from our firm's escrow account for the filing fees associated with same.

Please note that I have copied all counsel of record to this correspondence pursuant to the South Carolina Appellate Rules.

I thank you in advance for your time and attention to this matter, please do not hesitate to contact me if you should have any questions regarding this correspondence or the matters addressed herein.

Sincerely,



Andrew J. McCumber

AJM/scm

Enclosure(s) as stated.

cc: Robert T. Lyles, Esq., Attorney for Respondents