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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Ashford Subdivision Homeowners' Association, Inc., ..... Respondent,

v.

Larry W. Richardson, Gayle P. Richardson, and Conway Hospital, Inc.  
d/b/a Conway Medical Center, ..... Defendants

Of Whom Larry W. Richardson is the Appellant.

**RECEIVED**  
JAN 10 2020  
SC Court of Appeals

Appellate Case No.: 2019-001630

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE AND SERVE  
RESPONDENT'S REPLY BRIEF TO APPELLANT'S INITIAL BRIEF**

TO THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Pursuant to the South Carolina Appellate Court Rules, Respondent, by and through its undersigned counsel, hereby respectfully moves this Court for an Order granting Respondent an extension of time in which to file and serve its Reply Brief to Appellant's Initial Brief. Counsel for Respondent has been conscientious in their efforts to prepare Respondent's Brief in Reply to Petitioner's Initial Brief; however, due to counsel's current trial caseload, serious illness of counsel's close family member, along with the holiday season and the time necessary to prepare the Reply and Memorandum, Respondent requests a fifteen (15) day extension, which would place the new deadline at January 24, 2020.

Respondent would further submit that no prejudice will inure to the Appellant by granting this Motion. Respondent greatly appreciates the Court's time, attention, and assistance with regard to this request.

1 *adh*

Respectfully Submitted,

By: Angela D. Harrison  
Angela D. Harrison (Bar No. 78403)  
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**ATTORNEY FOR RESPONDENT**

January 9, 2020

Surfside Beach, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Ashford Subdivision Homeowners' Association, Inc., ..... Respondent,

v.

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SC Court of Appeals

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I hereby certify that I have served the Motion for Extension of Time in Which to File and Serve Respondent's Reply Brief to Appellant's Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, on January 9, 2020, addressed to Appellant at 303 Tapscott Street, Myrtle Beach, South Carolina 29579.

Respectfully Submitted,

By: \_\_\_\_\_

*Angela D. Harrison*

Angela D. Harrison (Bar No. 78403)

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Surfside Beach, SC 29587-4737

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**ATTORNEY FOR RESPONDENT**

January 9, 2020

Surfside Beach, South Carolina



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**Virginia Lee Moore**

*Certified Family Court Mediator*

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*Also member of North Carolina Bar*

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*Also member of Ohio Bar*

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January 9, 2020

**Sent Via Fed Ex: 7774 4101 6695**

South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
JAN 10 2020  
SC Court of Appeals

Re: Ashford Subdivision v. Larry Richardson  
Appellate Case No: 2019-001630  
File No.: P279AH

Dear Madame Clerk:

Enclosed please find the original and 7 copies of the Respondent's Motion to Dismiss Appeal and Memorandum in Support as well as the Respondent's Motion for Extension to Respond in the above referenced matter and Proofs of Delivery for same. Please file the original and returned clocked copies in the stamped, self-addressed envelope provided. By copy of this letter, we are serving same upon Appellant.

With kindest personal regards, I am

Sincerely,

*Angela D. Harrison*  
Angela D. Harrison

ADH/ch

Enclosures as stated.

cc: Ashford Subdivision HOA  
Larry Richardson

ORIGIN ID:GGEA (843) 650-9757  
ELIZABETH SARANITI  
MOORE, JOHNSON & SARANITI  
1271 GLENN'S BAY ROAD

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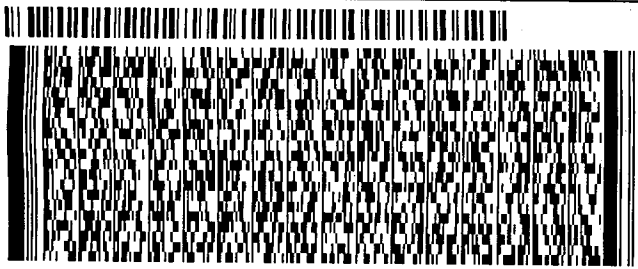
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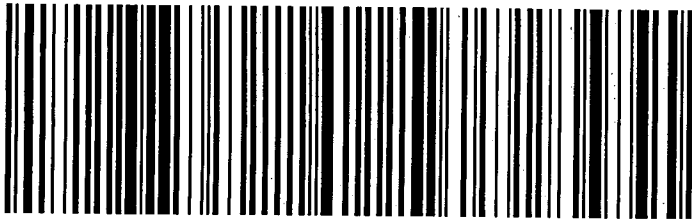
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JAN 10 2020

SC Court of Appeals

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