

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2019-001599

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

RECEIVED  
JAN 21 2020  
Appellant  
SC Court of Appeals

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND  
DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD

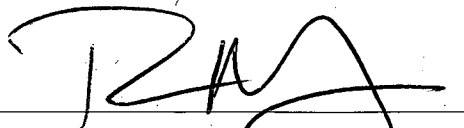
Ransome H. Helmly, SC Bar # 78081  
Law Office of Ransome H. Helmly, LLC  
409 Coleman Blvd., Ste. 200  
Mt. Pleasant, SC 29464  
Telephone: 843-884-0184  
Email: rhh@helmlylaw.com  
Attorney for Appellant

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

COME NOW Appellant, Karen Kavanaugh, (hereinafter "Appellant"), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, moves for a seven (7) day extension of time to file/serve her Motion for Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record On Appeal. Because of work-related and other time constraints and commitments, the undersigned respectfully requests that this deadline be extended by seven (7) days. The undersigned submits there is good cause to grant this request, the relief sought being consistent with the interests of justice, and not prejudicial to Respondents.

WHEREFORE, Appellant moves this Honorable Court to grant her leave to file/serve her Motion for Extension of Time to File Initial Brief and Designation of Matters to be Included in the Record on Appeal. With the requested extension, Appellant's Initial Brief and Designation of Matters to be Included in the Record on Appeal will be due on January 24, 2020.

Respectfully submitted,



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Email: rhh@hellylaw.com  
Attorney for Appellant

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

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Case No. 2018-CP-10-4907

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New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

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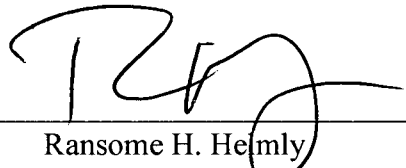
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Attorney for Appellant

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I, Ransome H. Helmly, on behalf of Appellant, hereby certify that a copy of the *Appellant's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matters to be Included in the Record on Appeal Out of Time* was sent all counsel of record on January 17, 2020, via United States Mail, postage pre-paid and addressed as follows:

William Kalivas, Esq.  
Smith, Closser & Wheeler, PA  
Post Office Box 40578  
Charleston, SC 29423  
843-760-0220  
Attorney for Respondent

  
\_\_\_\_\_  
Ransome H. Helmly

Mt. Pleasant, South Carolina

Dated: 1/17, 2020

LAW OFFICE OF  
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409 COLEMAN BLVD., SUITE 200  
MT. PLEASANT, SC 29464  
P: 843-884-0184  
F: 843-284-9871  
rhh@helmylaw.com

January 17, 2020

**VIA US MAIL and FACSIMILE**

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

RE: Karyn Kavanaugh, Appellant v. New Age Contractors, LLP, Respondent  
Case No. 2019-001599

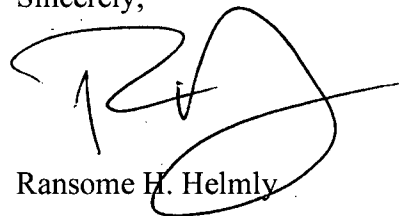
Dear Ms. Kitchings:

Enclosed for filing in connection with the above case, please find the original and one copy of Appellant's Motion for Extension of Time to file Initial Brief and Designation of Matters to be Included in the Record on Appeal, as well as the Proof of Service in connection with same.

Kindly return one clocked copy of each filing to us in the self-addressed stamped envelope provided. Thank you, in advance, for your assistance with this matter.

With kindest regards, I am

Sincerely,



Ransome H. Helmy

cc: William Kalivas, Esq.

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SC Court of Appeals

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Law Office of Ransome H. Helmly, LLC  
409 Coleman Blvd., Suite 200  
Mt. Pleasant, SC 29464

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SC Court of Appeals

TO:

The Honorable Jenny Abbott Kitchings  
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