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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JAN 27 2020  
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

David Rosen.....Appellant,

v.

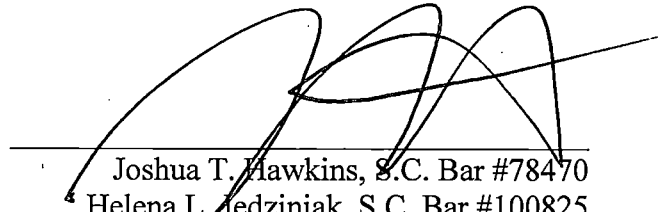
Josephine Middleton.....Respondent.

Appellate Case No. 2019-002040

**MOTION FOR EXTENSION OF TIME**

The appellant respectfully requests that the Appellate Court grant an extension of time for the appellant to respond to the Respondent's Motion to Dismiss for Lack of Jurisdiction. The appellant has partially drafted the Response, but Attorney Josh Hawkins has protection in Circuit Court and will be traveling out of the country and respectfully requests an extension. The appellant therefore respectfully requests a thirty-day extension of time to file his Reply Brief.

January 24, 2020



Joshua T. Hawkins, S.C. Bar #78470  
Helena L. Jedziniak, S.C. Bar #100825  
Hawkins & Jedziniak, LLC  
1225 South Church Street  
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**Attorneys for Appellants**

Copies:

Devon Marc Pureifoy  
Kimberly Truluck Thomason  
Truluck and Thomason, LLC  
3 Boyce Ave, Greenville, SC 29601  
**Attorney for Respondent Josephine Middleton**

South Carolina Office of Court Administration  
1220 Senate Street  
Columbia, South Carolina 29201-3739

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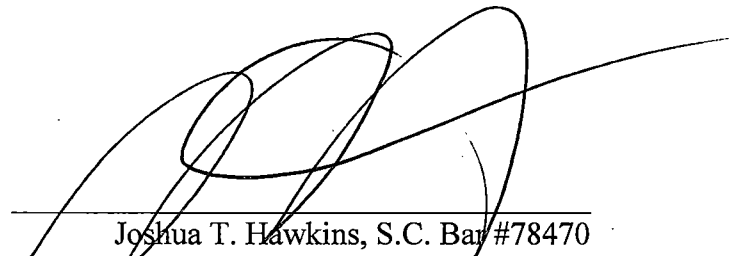
v.

Josephine Middleton.....Respondent.

Appellate Case No. 2019-002040

**PROOF OF SERVICE**

I certify that I served a Motion for an Extension of Time to file a Response to the Respondents Motion to Dismiss for Lack of Jurisdiction on Josephine Middleton by depositing copies of it in the United States Mail, postage prepaid, on January 23, 2020, addressed to its attorneys of record, Devon Marc Pureifoy and Kimberly Truluck Thomason, at 3 Boyce Avenue, Greenville, South Carolina 29601.



Joshua T. Hawkins, S.C. Bar #78470  
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SC Court of Appeals

January 24, 2020

Ms. Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: *David Rosen v. Josephine Middleton*  
Appellate Case No. 2019-002040

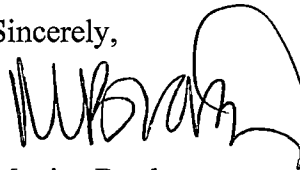
Dear Ms. Kitchings:

Please find enclosed for filing a motion for an extension of time in the case referenced above. Also please find enclosed the following:

- ✓ six (6) copies of the motion as required by the rules;
- ✓ proof of service of the motion on the respondents; and
- ✓ the filing fee of \$50.00.

Should you have any questions, please do not hesitate to contact our office.

Sincerely,



Monica Brody  
Paralegal

Enclosures

Copies:

Attorneys for Respondent Josephine Middleton  
Devon Marc Pureifoy  
Kimberly Truluck Thomason  
3 Boyce Avenue  
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(864) 331-1751

South Carolina Office of Court Administration  
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Columbia, South Carolina 29201-3739

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