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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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FEB 28 2020
SC Court of Appeals

Frances O. Johnson, Respondent,

v.

Mason C. Heyward, Berkeley Electric Cooperative, Inc., and Clementine Ravenel, Defendants,

Of whom Mason C. Heyward is the Appellant.

Appellate Case No. 2019-001216

The Honorable Mikell R. Scarborough
Charleston County
Trial Court Case No. 2008CP1001054

MOTION FOR EXTENSION OF TIME

Respondent moves this Honorable Court for an extension of time within which to prepare the Initial Brief and Designation in this appeal. In support of his Motion, Respondent will show:

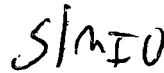
1. The Notice of Appeal was timely filed and served in this matter on July 17, 2019.
2. The Respondent's Initial Brief and Designation of Matter was initially due on February 1, 2020. The Respondent was previously granted an extension by Order filed February 4, 2020, therefore making the due date on or before March 4, 2020. This was Respondent's first request for an extension.
3. Due to the press of other litigational matters, Respondent needs additional time to prepare and file his Initial Brief and Designation.
4. Counsel for the Appellant has consented to an additional 30-day extension.

WHEREFORE, having fully set forth the grounds for the Motion, Respondent moves for an Order granting an extension of time of thirty (30) days for the preparation and filing of the Respondent's Initial Brief and Designation, so that such pleadings are due to be file and served no later than April 3, 2020.

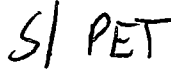
February 26, 2020



Harold A. Oberman



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154 King Street, 3rd Floor
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Attorneys for Respondent and Ralph L. Haynes

Other Counsel of Record:

John Edward Robinson
36 Broad Street
Charleston, SC 29401
Attorney for Appellant

John B. Williams
P. O. Box 1288
Moncks Corner, SC 29461
Attorney for Berkeley Electric Cooperative, Inc.

J. Jay Hulst
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Moncks Corner, SC 29461
Attorney for Berkeley Electric Cooperative, Inc.

Bernard E. Ferrara, Jr.
4045 Bridgeview Drive
N. Charleston, SC 29405
Attorney for the County of Charleston

G. Simms McDowell, III
68 Legare Street
Charleston, SC 29401
Attorney for Appellant

THE STATE OF SOUTH CAROLINA
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Frances O. Johnson, Respondent,

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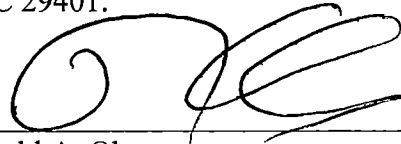
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PROOF OF SERVICE

I certify that on the 26th of February, 2020, I served the foregoing Motion for Extension of Time on opposing counsel of record by depositing in the United States Mail, postage prepaid, addressed to John Edward Robinson, Esquire, 36 Broad Street, Charleston, SC 29401 and G. Simms McDowell, III, Esquire, 68 Legare Street, Charleston, SC 29401.

February 26, 2019



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February 26, 2020

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SC Court of Appeals

Honorable V. Claire Allen
Deputy Clerk
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RE: Francis O. Johnson, Respondent v. Mason C. Heyward, Berkeley Electric Cooperative, Inc., and Clementine Ravenel, Defendants; Of Whom Mason C. Heyward is the Appellant
Case No. 2008-CP-10-1054
Appellant Case No. 2019-001216

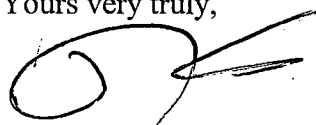
Dear Ms. Allen:

I enclose the original and six (6) copies of a Motion for a 30-day extension of time to file Respondent's Initial Brief and Designation of Matter in the above-captioned matter. Counsel for the Appellant has agreed to the extension. Our check in the amount of \$50.00 for the filing fee is also enclosed. My Proof of Service is attached to this Motion.

I also enclose an additional copy of the Motion together with a stamped, self-addressed envelope. Would you be so kind as to have a member of your staff file this Motion and return a copy to me showing the date and time of filing.

With warmest personal regards, I remain

Yours very truly,



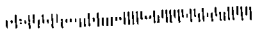
Harold A. Oberman

HAO/shb
Enclosures

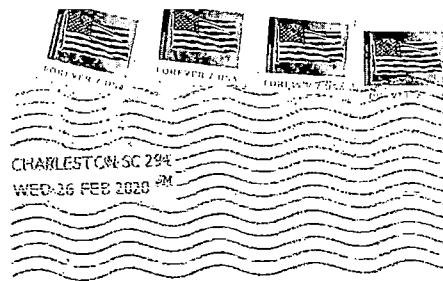
cc: John Edward Robinson, Esquire (w/enclosures)
G. Simms McDowell, III, Esquire (w/enclosures)
John B. Williams, Esquire (w/enclosures)
J. Jay Hulst, Esquire (w/enclosures)
Bernard E. Ferrara, Jr., Esquire (w/enclosures)

OBERMAN & OREDMAN

ATTN



CHARLESTON, SOUTH CAROLINA 29407



Honorable V. Claire Allen
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