

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HAMPTON COUNTY
Court of Common Pleas

Perry M. Buckner III, Circuit Court Judge

Case No. 2019-001884

Gary L. Mole, as Personal Representative
of the Estate of Eddie Mole, Deceased Appellant,

v.
Kramer Apartments, LLC Respondent.

RECEIVED
MAR 20 2020
SC Court of Appeals

MOTION FOR EXTENSION OF TIME

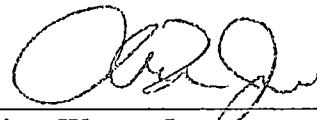
Pursuant to Rule 224, *SCACR*, Appellant, Gary Mole, by and through his undersigned counsel, Clarissa Warren Joyner, hereby moves this Honorable Court for an Order Relaxing Rule 207(a) and 208(a), *SCACR*, and for a thirty (30) day extension of time to file and serve the Initial Brief and Designation of matter to be Included in the Record. Appellant would respectfully show this Honorable Court as follows:

1. Appellant's Counsel received the Transcript of Record in this matter on February 20, 2020, and no prior requests for extension of time to file and serve the Initial Brief have been made. Appellant's counsel is a solo practitioner and because of the coronavirus protocols, her disabled daughter is now home full-time, and accommodations had to be made to her schedule to care for her daughter and maintain her court and office schedule. As a result of these extraordinary circumstances, counsel for the Appellant had limited time to complete the Initial Brief and

Designation of Matter to be Included in the Record. The Appellant needs additional time to adequately present all the issues for the Court's review.

WHEREFORE, the Appellant, by and through his undersigned counsel, and based on good cause shown, hereby respectfully requests that the time period to file and serve copies of the Initial Brief and Designation of Matter to be Included in the Record on the Clerk of Court and opposing counsel be extended by thirty (30) days to April 19, 2020.

Respectfully Submitted,



Clarissa Warren Joyner
1259 Amelia Street, Suite A
Orangeburg, SC 29115
(803) 534-8393 Telephone
(803) 534-7885 Facsimile
Attorney for Petitioner

Other Counsel of Record:
H. Ford Thrift, Esquire
Morgan S. Templeton, Esquire
Attorneys for the Respondent
P.O. Box 1200
Charleston, SC 29402

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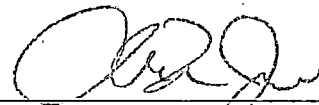
v.

Kramer Apartments, LLC Respondent.

PROOF OF SERVICE

I certify that I have served a Motion for Extension of Time on opposing counsels, H. Ford Thrift and Morgan S. Templeton, by depositing a copy of it in the United States Mail, postage prepaid, on March 19, 2020, addressed to H. Ford Thrift, Esquire and Morgan S. Templeton, Attorneys for the Respondent, P.O. Box 1200, Charleston, SC 29402.

Dated: March 19, 2020



Clarissa Warren Joyner
Attorney for the Appellant
1259 Amelia Street, Suite A
Orangeburg, SC 29115
(803) 534-8393 Telephone
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Other Counsel of Record:
H. Ford Thrift, Esquire
Morgan S. Templeton, Esquire
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Clarissa Warren Joyner

Attorney at Law

1259 Amelia Street, Suite A ~ Post Office Box 1724 ~ Orangeburg, South Carolina 29116-1724

Phone (803) 534-8393 ~ Facsimile (803) 534-7885 ~ Email joynerlawfirm@aol.com

March 19, 2020

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

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MAR 20 2020

Re: **Gary L. Mole v. Kramer Apartments, LLC** SC Court of Appeals
Docket No.: 2019-001884

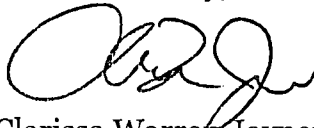
Dear Ms. Kitchings:

Please find enclosed a Motion for Extension of Time to file and serve the initial brief and designation of matter to be included in the record, and Proof of Service In the above referenced matter along with the \$25.00 filing fee. Please file the original and return copies to me in the return envelope provided for your convenience.

Should you have any questions or need any additional information, please do not hesitate to contact me.

With kind regards, I am

Sincerely,



Clarissa Warren Joyner
Attorney at Law

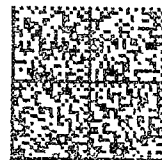
CWJ/mdc
Enclosures

cc: H. Ford Thrift
Morgan S. Templeton

The Law Firm of Clarissa Warren Joyner
Attorney and Counselor at Law
Post Office Box 1724
Orangeburg, South Carolina 29116-1724

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The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201



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