

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

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APR 27 2020
SC Court of Appeals

MOTION FOR EXTENSION OF TIME

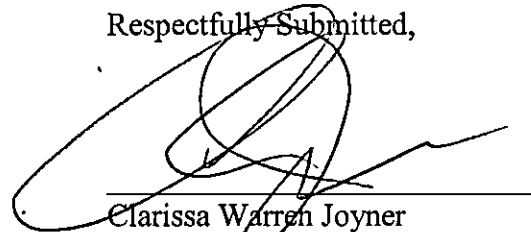
Pursuant to Rule 224, *SCACR*, Appellant, Gary Mole, by and through his undersigned counsel, Clarissa Warren Joyner, hereby moves this Honorable Court for an Order Relaxing Rule 207(a) and 208(a), *SCACR*, and for a thirty (30) day extension of time to file and serve the Initial Brief and Designation 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 one prior request for extension of time to file and serve the Initial Brief has been made and granted. Appellant's counsel is a solo practitioner and because of the coronavirus protocols, her disabled daughter is now home full-time without the assistance of her care provider. She requires full-time care and cannot bathe, dress or feed herself. Appellant's counsel tried to make accommodations for her daughter, but assistance could not be brought into the home due to her

daughter's medical history which includes blindness, severe autism, keratinizing squamous metaplasia, and a recent bacterial infection which required four (4) blood transfusions. Her immune system is too compromised for her to have contact with anyone at this time other than her immediate family who do not leave the home. As a result, Appellant's Counsel's at home office schedule has been hampered by her responsibilities to her chronically ill child at this time. 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 May 22, 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

Orangeburg, South Carolina
April 23, 2020

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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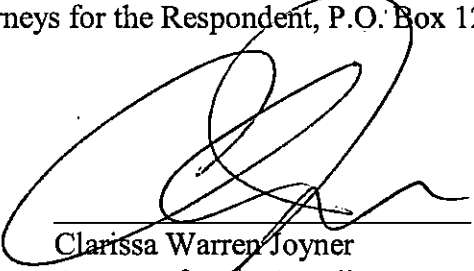
Kramer Apartments, LLC Respondent.

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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 April 23, 2020, addressed to H. Ford Thrift, Esquire and Morgan S. Templeton, Attorneys for the Respondent, P.O. Box 1200, Charleston, SC 29402.

Dated: 4-23-2020


Clarissa Warren Joyner
Attorney for the Appellant
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Orangeburg, SC 29115
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Other Counsel of Record:
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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

April 23, 2020

Attn : Sierra
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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

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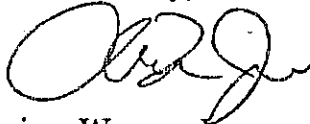
Dear Sierra:

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. 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
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Orangeburg, South Carolina 29116-1724

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Attn: Sierra
S.C. Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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