

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,

Appellant.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON
APPEAL

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RECEIVED
May 12 2020
SC Court of Appeals

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, move for leave to File Initial Reply Brief and Designation of Matters to be Included in the Record On Appeal. The requested extension is necessary due to various logistical complications arising from the COVID19 pandemic and Appellant’s inability to complete the Initial Reply Brief. Further, this extension is necessary because of general operational deficiencies related to the Coronavirus crisis.

WHEREFORE, Appellant respectfully submits good cause exists for the granting of this motion, and request that the Court issue an Order granting her thirty (30) additional days in which to file and serve the Initial Reply Brief. With the requested extension, the Reply Brief will be due on June 10, 2020.

Respectfully submitted,

s/Ransome H. Helmly

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Dated: May 11, 2020

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. 2018-CP-10-4907

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

PROOF OF SERVICE

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I, Ransome H. Helmly, on behalf of Appellant, hereby certify that a copy of the *Motion for Extension of Time to File and Serve Appellant's Initial Reply Brief and Designation of Matters to be Included in the Record on Appeal* was sent via electronic mail to all counsel of record on May 11, 2020,

s/Elizabeth R. O'Neil

Paralegal to Ransome H. Helmly

Mt. Pleasant, South Carolina

Dated: May 11, 2020