

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2019-001501

RECEIVED
JUN 24 2020
SC Court of Appeals

James John Todd Kincannon,Appellant,

v.

Ashely Suzanne Griffith, Moore Taylor Law Firm, P.A., Vance Stricklin
and Amber Fulmer, Respondents.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE
INITIAL REPLY BRIEF AND DESIGNATION OF MATTER**

Respondents Ashely Suzanne Griffith, Moore Taylor Law Firm, P.A., Vance Stricklin and Amber Fulmer (Respondents), respectfully move this Court for an extension of time to file and serve their Initial Reply Brief and Designation of Matter.

The Respondents' motion is based on the grounds that Counsel for Respondents requires additional time to prepare his response due to an unusually busy caseload, the need to obtain and review a hearing transcript, and a planned vacation out of state. As a result of these mitigating factors the undersigned counsel needs additional time to prepare the Initial Reply Brief and Designation of Matter, and would respectfully request an

additional thirty (30) days to complete, file and serve these pleadings. This is the first request for an extension in this matter.

WHEREFORE, the Respondents respectfully request that they be granted an additional thirty (30) days to file their Initial Reply Brief and Designation of Matter.

MOORE TAYLOR LAW FIRM, PA

BY: 

James Edward Bradley, SC Bar #66130
Post Office Box 5709
West Columbia, South Carolina 29171
(803) 796-9160
Attorney for Respondents

West Columbia, South Carolina
June 24, 2020

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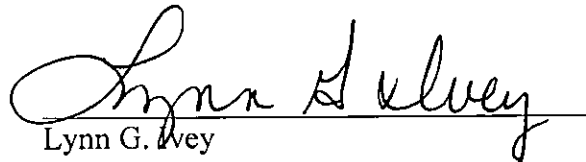
v.

Ashely Suzanne Griffith, Moore Taylor Law Firm, P.A., Vance Stricklin
and Amber Fulmer, Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the Respondents' Motion for Extension of Time to File Reply Brief and Designation of Matter by depositing a copy of same in the United State Mail, postage prepaid, on June 24, 2020, addressed to the *pro se* Appellant of record as follows:

James John Todd Kincannon
214 Jones Avenue
Simpsonville, SC 29681


Lynn G. Ivey

West Columbia, South Carolina
June 24, 2020

June 24, 2020

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

Re: James John Todd Kincannon vs. Ashely Suzanne Griffith, Moore
Taylor Law Firm, P.A., Vance Stricklin, and Amber Fulmer
C/A No.: 2019-CP-32-01168
Appellate Case No.: 2019-001501

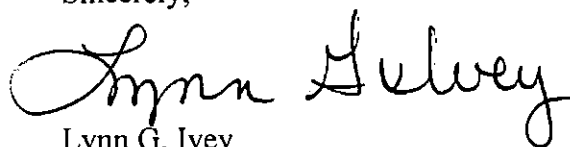
Dear Ms. Kitchings:

Enclosed for filing is the original and two copies of Respondents' Motion for Extension of Time to File their Initial Reply Brief and Designation of Matter, and our firm check in the amount of \$50.00 for the filing fee. Please have the extra copies clocked in and returned to us.

By copy of this letter, I am serving the Appellant of this motion as well.

Thank you for your consideration.

Sincerely,



Lynn G. Ivey
Assistant to James Edward Bradley

Enclosures

cc: James J. T. Kincannon

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