

RECEIVED

AUG 03 2020

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master-In-Equity

Appellate Case No.: 2017-001628

Corona Campbell as Personal Representative of the
Estate of Ann M. Blandin, Respondent-Appellant,

-v-

City of North CharlestonAppellant-Respondent.

**RESPONDENT-APPELLANT’S MOTION
FOR AN EXTENSION OF TIME**

PLEASE TAKE NOTICE that the Respondent-Appellant, Corona Campbell as Personal Representative of the Estate of Ann M. Blandin, by and through her undersigned counsel, moves for a fifteen (15) day extension of time within which to file her petition for rehearing. Respondent-Appellant’s petition, if filing, is currently due by August 5, 2020. This request is necessary due to the undersigned counsel’s numerous other work conflicts, scheduling deadlines, and other court appearances/filings.

For these reasons, the undersigned moves for an extension of time pursuant to Rule 263(a), SCACR. The undersigned attorney for the Respondent-Appellant hereby certifies that he has consulted with counsel for Appellant-Respondent, Robert H. Hood, Jr., who consents to Respondent-Appellant’s request for an additional fifteen (15) day extension of time to file her petition for rehearing.

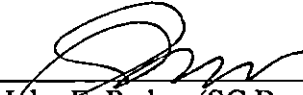
Counsel for the Respondent-Appellant therefore requests the petition for rehearing be due for service on August 20, 2020.

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

July 31, 2020
Hampton, South Carolina

BY: _____


John E. Parker (SC Bar #4442)
William F. Barnes, III (SC Bar #78220)
101 Mulberry Street, East
P.O. Box 457
Hampton, SC 29924
Phone: (803) 943-2111
Email: jparker@pmped.com
Email: wbarnes@pmped.com

-And-

Lawrence C. Kobrovsky, Esquire
198 Rutledge Ave, Suite 7
Charleston, SC 29403
Phone: (843) 853-3703
Email: kobrovskyl@bellsouth.net
Attorneys for Respondent-Appellant

Other Counsel of Record:

Robert H. Hood, Jr., Esquire
Deborah H. Sheffield, Esquire
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402

J. Brady Hair, Esquire
Derk Van Raalte, Esquire
Hair & Van Raalte
Post Office Box 61896
Charleston, SC 29419
Attorneys for Appellant-Respondent

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

AUG 03 2020

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Mikell R. Scarborough, Master-In-Equity

Appellate Case No.: 2017-001628

Corona Campbell as Personal Representative of the
Estate of Ann M. Blandin,Respondent-Appellant,

-v-

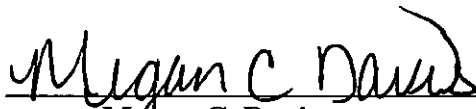
City of North Charleston, Appellant-Respondent.

CERTIFICATE OF SERVICE

This is to certify that I, **Megan C. Davis**, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Respondent-Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within the **Appellant's Motion for an Extension of Time** to:

Robert H. Hood, Jr., Esquire
Debroah H. Sheffield, Esquire
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402

J. Brady Hair, Esquire
Derk Van Raalte, Esquire
Hair & Van Raalte
Post Office Box 61896
Charleston, SC 29419


Megan C. Davis

July 31, 2020
Hampton, South Carolina

PMPED
PETERS | MURDAUGH | PARKER | ELTZROTH | DETRICK
ATTORNEYS AT LAW

RECEIVED

AUG 03 2020

SC Court of Appeals

July 31, 2020

John E. Parker
Direct Dial: (803) 914-2004
Email: jparker@pmped.com
Paralegal: mdavis@pmped.com

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

Re: Corona Campbell v. City of North Charleston
Appellate Case No.: 2017-001628

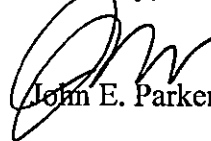
Dear Ms. Kitchings:

Enclosed, please find the original and six (6) copies of Respondent-Appellant's Motion for an Extension of Time in the above-referenced case. Please file the original and return a clocked copy of same in the self-addressed stamped envelope provided. Also, enclosed is our firm's check in the amount of \$50.00 for the filing fee.

If you have any questions, please let us know.

With kind regards, I am

Sincerely,



John E. Parker

JEP/mcd
Enclosures as stated

cc: Robert H. Hood, Jr., Esquire
Deborah Harrison Sheffield, Esquire
Lawrence C. Kobrovsky, Esquire
J. Brady Hair, Esquire, Esquire
Derk Van Raalte, IV, Esquire



U.S. POSTAGE
 ZIP 29024 \$001.80⁰
 02 48
 0000350774 JUL 31 2020

First Class Mail

RECEIVED
 AUG 03 2020
 SC Court of Appeals

PMPED

PETERS | MURDAUGH | PARKER | ELTZROTH | DETRICK
 101 Mulberry Street East
 Post Office Box 457
 Hampton, South Carolina 29924

TO:

The Honorable Jenny Abbott Kitchings
 S.C. Court of Appeals Clerk of Court
 Post Office Box 11629
 Columbia, SC 29211-1629

