

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Francis O. Johnson and Ralph L. Haynes, Respondents,

v.

Mason C. Heyward, Berkeley Electric Cooperative, Inc., and Clementine
Ravenel, Defendants,

Of whom Mason C. Heyward is the Appellant.

Appellate Case No. 2019-001216

The Honorable Mikell R. Scarborough
Charleston County
Trial Court Case No. 2008CP1001054

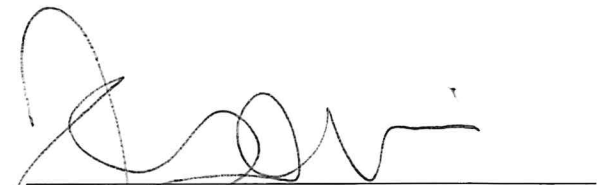
RECEIVED

Aug 12 2020

SC Court of Appeals

Motion for Extension of Time to File Appellant's Record on Appeal

COMES NOW your Appellant by and through his undersigned attorney of record,
and must respectfully move this Honorable Court, in accordance with the provisions of
the South Carolina Rule of Appellate Procedure 263(b) for an Order extending the time to
serve and file the Appellant's Record on Appeal, which is currently due on August 12,
2020.



John Edward Robinson
36 Broad Street
Charleston, SC 29401
(843) 723-5152
Attorney for Appellant Mason C. Heyward

Other Counsel of Record:

Marvin I. Oberman
60 Markfield Dr., Ste. 2
Charleston, SC 29407
Attorney for Respondent and Ralph L. Haynes

Harold Alan Oberman
60 Markfield Dr., Ste. 2
Charleston, SC 29407
Attorney for Respondent and Ralph L. Haynes

Paul E. Tinkler
154 King St., 3rd Floor
Charleston SC 29401
Attorney for Respondent and Ralph L. Haynes

John B. Williams
P.O. Box 1288
Moncks Corner, SC 29461
Attorney for Berkeley Electric Cooperative, Inc.

J. Jay Hulst
P.O. Box 1288
Moncks Corner, SC 29461
Attorney for Berkeley Electric Cooperative, Inc.

Bernard E. Ferrara, Jr.
4045 Bridgeview Dr.
N. Charleston, SC 294057464
Attorney for the County of Charleston

G. Simms McDowell, III
68 Legare St.
Charleston, SC 29401
Attorney for Appellant

John Edward Robinson

*36 Broad St.
P.O. Box 670
Charleston, SC 29401
(843) 723-5152
(843) 577-4570 fax*

*The Law Offices of
John Edward Robinson*

*Post Office Box 670
Charleston, SC 29401*

August 12, 2020

**VIA US MAIL and
ELECTRONIC MAIL**

Clerk, SC Court of Appeals
Attn: LaToyla Burns
P.O. Box 11629
Columbia, SC 29211

RECEIVED
Aug 12 2020
SC Court of Appeals

RE: Francis O. Johnson and Ralph L. Haynes, Respondents, v. Mason C. Heyward, Berkeley Electric Cooperative, Inc., and Clementine Ravenel, Defendants, Of whom Mason C. Heyward is the Appellant, Case No. 2019-001216.

Dear LaToyla:

This is a request to extend the deadline for submission of Appellant's Record of Appeal, which is currently due on August 12, 2020. I attach a formal Motion for Extension, in addition to this letter, and can send the filing fee of \$50.00 if requested, although it appears to be waived by the Supreme Court's Order of July 24, as amended. Opposing counsel, Harold Oberman, has consented to the extension.

This request is made because while I was in the process of finalizing documents to accompany our submission, it was discovered that several exhibits are oversized and printed on boarded material. These are some of Mr. Oberman's exhibits and we certainly want the Court to have them. Our firm is unable to mail these oversized exhibits to the court via USPS, or to timely reproduce them in a properly legible form. One is dimensionally large (approximately 3x5') and will need to be hand-delivered. Chief Justice Beatty's Order of July 24 states that any non-USPS deliveries may be rejected and our firm

needs to make arrangements for hand delivery with the Court. At your convenience within the allotted extension period, please advise me how I may best make hand-delivery of the Record and the accompanying oversized exhibits.

Sincerely,

S/ John Edward Robinson

John Edward Robinson
36 Broad Street
Charleston, SC 29401
(843) 723-5152
Attorney for Appellant Mason C. Heyward

Cc:

Marvin I. Oberman
60 Markfield Dr., Ste. 2
Charleston, SC 29407
Attorney for Respondent and Ralph L. Haynes

Harold Alan Oberman
60 Markfield Dr., Ste. 2
Charleston, SC 29407
Attorney for Respondent and Ralph L. Haynes

Paul E. Tinkler
154 King St., 3rd Floor
Charleston SC 29401
Attorney for Respondent and Ralph L. Haynes

John B. Williams
P.O. Box 1288
Moncks Corner, SC 29461
Attorney for Berkeley Electric Cooperative, Inc.

J. Jay Hulst
P.O. Box 1288
Moncks Corner, SC 29461
Attorney for Berkeley Electric Cooperative, Inc.

Bernard E. Ferrara, Jr.
4045 Bridgeview Dr.
N. Charleston, SC 294057464
Attorney for the County of Charleston

G. Simms McDowell, III
68 Legare St.
Charleston, SC 29401
Attorney for Appellant