

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

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SC Court of Appeals

Common Pleas Court Case No. 2019-CP-15-00218
Appellate Case No. 2020-00607

Larry Rahn.....Respondent

vs.

Barbara SmithAppellant

APPELLANT'S REQUEST FOR EXTENSION OF TIME TO SERVE REPLY BRIEF

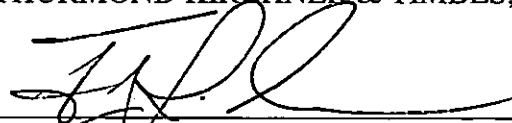
COME NOW the Appellant, Barbara Smith, and hereby request a thirty (30) day extension of time to serve and file her Initial Brief upon the Respondent, respectfully showing as follows:

1. By letter to the Court dated July 31, 2020, Appellant's Counsel requested a thirty (30) day extension of time to file her Initial Brief, which was their first such request. This Court granted Appellant's initial request.

2. Appellant hereby requests an additional thirty (30) days to finish her Initial Brief for filing.

WHEREFORE Appellant respectfully requests that this Court issue an Order granting unto the Appellant a thirty (30) day extension to time to file her Initial Brief making it due on October 6, 2020.

THURMOND KIRCHNER & TIMBES, P.A.

A handwritten signature in black ink, appearing to read 'T. Rode', is written over a horizontal line.

THOMAS J. RODE, Bar No. 77480

15 Middle Atlantic Wharf

Charleston, South Carolina 29401

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Attorneys for Appellant

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Larry Rahn.....Respondent

vs.

Barbara SmithAppellant

PROOF OF SERVICE

I, hereby certify that the enclosed was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on this day and properly posted for delivery to the following addresses:

Ronnie L. Crosby
101 Mulberry Street East
P.O. Box 457
Hampton, SC 29924

and

Gregory E. Parker
609 Sims Avenue
Columbia, SC 29205

THURMOND KIRCHNER & TIMBES, P.A.

Adam Smith
Paralegal to Thomas J. Rode
Charleston, South Carolina
Dated: September 3, 2020

THURMOND KIRCHNER
& TIMBES, P.A.
ATTORNEYS AT LAW



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September 3, 2020

VIA US MAIL, FAX, AND EMAIL

Jenny Abbott Kitchings, Clerk of Court
SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211
(F) 803-734-1839
ctappfilings@sccourts.org

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SC Court of Appeals

Re: *Larry Rahn v. Barbara Smith*
Appellate Case No. 2020-000607

Dear Honorable Kitchings:

Enclosed please find Appellant's Motion to Extend the Time to File Her Brief in the above-referenced matter.

Very truly yours,

THURMOND KIRCHNER & TIMBES, P.A.

Adam Smith

Adam Smith
Paralegal to Thomas J. Rode

/ags
Enc. As Stated

CC: Ronnie Crosby and Gregory Parker

THURMOND KIRCHNER
& TIMBES, P.A.
ATTORNEYS AT LAW

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Charleston, South Carolina 29401

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Office of Court Administration
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

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