

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Sep 16 2020

SC Court of Appeals

Appeal from Greenwood County
Greenwood County Court of Common Pleas
Hon. Judge Donald B. Hocker, Family Court Judge, Presiding

17-CP-24-01343

Karen Petit.....Appellant,

Versus

Phyllis Jean Krohn, USAA Federal Savings Bank, and USAA Investment Management
Co.,.....Respondents.

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

s/Scarlet B. Moore

Scarlet B. Moore, #72534
Attorney for Appellant
P.O. Box 17615
Greenville, S.C. 29606
(864) 214-5805 / (864) 752-0930 (FAX)

September 16, 2020
Greenville, South Carolina

NOW INTO COURT, comes the Appellant Karen Petit, who respectfully moves this Honorable Court for an extension to file the Initial Brief and Designation of Matter for the Record on Appeal for thirty (30) days, for the following reasons, to wit:

Undersigned counsel needs additional time to complete the Initial Brief and Designation of Matter for the Record on Appeal. Counsel was given formal notice on September 8, 2020, that the Solicitor in Abbeville would call a General Sessions case to trial the week of September 28, 2020, wherein counsel represents a client accused of attempted murder and first degree burglary. Preparation for the General Sessions matter has required additional time for counsel's schedule. Additionally, counsel was unexpectedly ordered by the 4th Circuit Federal Court of Appeals to brief an issue relative to an *Anders* brief filed on behalf of a federal client, which brief was due on September 10, 2020. Counsel has consulted with opposing counsel regarding this matter, and no party objects to the request for an extension.

WHEREFORE, the undersigned prays for an Order of this Court extending the time for counsel to file the initial brief and designation of matter to be included in the record on appeal for thirty (30) days.

Respectfully Submitted,

s/Scarlet B. Moore

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CERTIFICATE OF SERVICE

I certify that on this date, September 16, 2020, I served a copy of the **Appellant’s Motion for Extension to File the Initial Brief and Designation of Matter for the Record on Appeal** on opposing counsel to their respective **E-MAIL** addresses, pursuant to the Order of the Supreme Court Appellate Case No. 2020-000447(g)(3).

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s/Scarlet B. Moore

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Greenville, South Carolina
September 16 2020.

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September 16, 2020

Jenny Abbott Kitchings
Clerk, The South Carolina Court of Appeals
P.O. Box 11629
Columbia, S.C. 29211

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SC Court of Appeals

RE: Karen Petit v. Phyllis Jean Krohn, et al, 2017-CP-24-01343

Dear Madam Clerk,

Enclosed please find the Appellant's Motion for Extension of Time to File the Initial Brief and Designation of Matter to be Included in the Record on Appeal, along with a Certificate of Service. Please let me know if you have questions regarding the enclosed. With kind regards, I remain

Very Truly Yours,

s/Scarlet B. Moore

Scarlet B. Moore, Esq.
Counsel for Appellant

SBM/sfk

Cc: Jane H. Merrill, Esq.
William S. Brown, Esq.
Joshua S. Nasrollahi, Esq.