

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HAMPTON COUNTY
Court of Common Pleas

Perry M. Buckner III, Circuit Court Judge

Case No. 2019-001884

RECEIVED
Oct 22 2020
SC Court of Appeals

Gary L. Mole, as Personal Representative
of the Estate of Eddie Mole, Deceased Appellant,

v.

Kramer Apartments, LLC Respondent.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 224, *SCACR*, Appellant, Gary Mole, by and through his undersigned counsel, Clarissa Warren Joyner, hereby moves this Honorable Court for an Order Relaxing Rule 211(a) *SCACR*, and for an extension of time to October 22, 2020 to file and serve the Appellant's Final Brief and Appellant's Final Reply Brief. Appellant would respectfully show this Honorable Court as follows:

1. Appellant's Counsel was in a serious car accident with injuries in September 2020 which delayed her completion of the final briefs in the above-referenced matter. Additionally, Appellant's Counsel is a solo practitioner and because of the coronavirus protocols, her disabled daughter is now home full-time without the assistance of her care provider. She requires full-time care and cannot bathe, dress or feed herself. Appellant's counsel tried to make accommodations for her daughter, but assistance could not be brought into the home due to her daughter's medical history

which includes blindness, severe autism, keratinizing squamous metaplasia, and a recent bacterial infection which required four (4) blood transfusions. Her immune system is too compromised for her to have contact with anyone at this time other than her immediate family who do not leave the home. As a result, Appellant's Counsel's at home office schedule has been hampered by her responsibilities to her chronically ill child at this time as well as the injuries she sustained in a serious automobile accident in September 2020. As a result of these extraordinary circumstances, counsel for the Appellant had limited time to complete the Final Appellant's Brief and Final Reply Brief. The Appellant needed additional time to adequately present all the issues for the Court's review.

WHEREFORE, the Appellant, by and through his undersigned counsel, and based on good cause shown, hereby respectfully requests that the time period to file and serve copies of the Appellant's Final Brief and Appellant's Final Reply Brief be extended October 22, 2020.

Respectfully Submitted,

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