

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Marlboro County
Court of Common Pleas

The Honorable Paul M. Burch, Circuit Court Judge

Case No. 2016-CP-34-00072

Appellate Case No. 2020-000989

RECEIVED

Oct 23 2020

SC Court of Appeals

Daisy Frederick,

Respondent,

v.

Daniel Lee McDowell,

Appellant.

**Respondent's Motion for Extension of Time to Serve and File Initial Brief and Designation
of Matter**

ANASTOPOULO LAW FIRM, LLC
J. Camden Hodge (SC #100638)
Eric M. Poulin (SC #100209)
Roy T. Willey, IV (SC #101010)
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Attorneys for the Respondent

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF

APPEALS:

COMES NOW RESPONDENT Daisy Frederick, by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file and serve her initial brief and corresponding designation of matter to be included in the record on appeal.

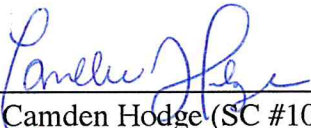
Appellant served his initial brief and designation of matter on or about October 16, 2020. Accordingly, the present deadline for Respondent's initial brief and designation of matter is November 17, 2020. Respondent respectfully requests that this deadline be extended by thirty (30) days from the present due date, which would therefore make Respondent's deadline December 16, 2020. Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant, as evidenced by Appellant's consent to the requested extension.

WHEREFORE, Respondent respectfully moves this Honorable Court to grant her an additional thirty (30) days to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing and serving the same would be December 16, 2020 according to the undersigned's calculations. Further, Respondent respectfully requests that this Court hold her present initial brief and designation of matter deadline in abeyance until this Court rules upon the present Motion.

[Signature Block on Following Page]

Respectfully submitted,

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SAMANTHA SUTTON (SC)(NC)
CASEY VAN VALKENBURGH (SC)(IL)(MO)
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DANNY LEE WILLARD, JR. (SC)
L. CRAYTON WILLIAMS (SC)

October 23, 2020

Via Email

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
ctappfilings@sccourts.org

Re: Daisy Frederick v. Daniel McDowell
Appellate Case No.: 2020-00989

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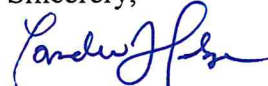
*OF COUNSEL

Dear Ms. Kitchings:

I hope this finds you well. Attached to this email please find Respondent's Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter. This is Respondent's First Extension Request, and Appellant's counsel has consented to the request.

This Motion is being submitted for filing via email pursuant to section (c)(6) of the Supreme Court's Order re: Operation of the Appellate Courts During the Coronavirus Emergency (as amended May 29, 2020). Thank you for your kind assistance, and please do not hesitate to contact me with any questions or concerns.

Sincerely,



J. Camden Hodge

cc: R. Hawthorne Barrett
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