

**IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from the Orangeburg County Court of Common Pleas

James B. Jackson, Master-in-Equity

Case No. 2020-001254

**KACEY GREEN AND CHARINRATH GREEN,
Appellant-Respondent,**

v.

**MERVIN LEE JOHNSON,
Respondent-Appellant.**

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MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Pursuant to Rule 263(b), SCACR, counsel for Appellant, hereby moves for an additional thirty (30) day extension of time in which to file its initial brief. Appellant-Respondent received a copy of all available transcripts as of October 15, 2020. Thus, the current deadline is November 16, 2020. Appellant-Respondent anticipates the need for additional time to prepare its initial brief in light of courts reopening throughout the state and numerous cases now appearing on the roster. As such, Appellant-Respondent requests an additionally thirty (30) day extension for a new deadline of Monday, December 14, 2020.

WHEREFORE Appellant-Respondent's counsel prays for an Order extending the time to file the initial brief until December 14, 2020.

RESPECTFULLY SUBMITTED,

s/Virginia W. Williams

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November 9, 2020
Orangeburg, South Carolina

ATTORNEYS FOR PLAINTIFF

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

James B. Jackson, Master-In-Equity

Circuit Court Case No. 2019-CP-38-00053
Appellate Court Case No. 2020-001254

KACEY GREEN AND CHARINRATH GREEN,
Appellant-Respondent,

v.

MERVIN LEE JOHNSON,
Respondent-Appellant.

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PROOF OF SERVICE

I certify that I have served the Motion for Extension to file initial brief via email to opposing counsel, Todd Flippin, on November 9, 2020, at tflippin@holcombebomar.com.

RESPECTFULLY SUBMITTED,

s/Virginia W. Williams _____

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November 9, 2020
Orangeburg, South Carolina

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November 9, 2020

VIA E-FILING ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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Nov 09 2020
SC Court of Appeals

Re: Green v. Johnson
Appellate Case No. 2020-001254

Dear Ms. Kitchings:

Please find enclosed for e-filing Appellant-Respondent's Motion for Extension to file the initial brief along with the certificate of service indicating service upon opposing counsel.

Yours truly,



Virginia W. Williams

VWW/csp

CC: Todd R. Flippin (via email)
Co-counsel Mason West (via email)