

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM JASPER COUNTY

Court of Common Pleas

R. Thayer Rivers, Jr., Special Referee

Case No. 2018-CP-27-00507

Appellate Case No. 2020-001301

Maria Hernandez.....Respondent,

v.

Mary V. Fields, Dora Bennett, Shaakira Saffir
a/k/a Shaakira Saffir Nia Rashad
f/k/a Audrey I. Knight, Defendants

Of whom Mary V. Fields and Dora Bennett are Respondents
and Shaakira Saffir is the.....Appellant.

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SC Court of Appeals

MOTION FOR EXTENSION OF TIME

Drew B. Walker, Esq.
Kevin Maroney, Esq.
Rogers Lewis Jackson Mann & Quinn
P.O. Box 11803
Columbia, SC 29211
(803) 256-1268 (Drew Walker)
(803) 978-2832 (Kevin Maroney)
Attorneys for Respondent,
Maria Hernandez

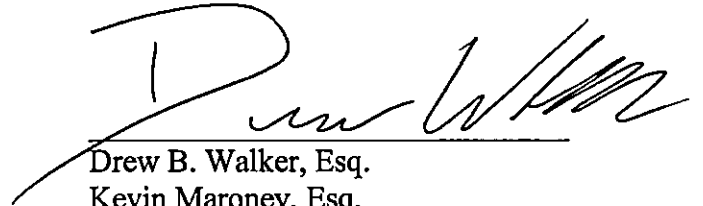
MOTION FOR EXTENSION OF TIME & MEMORANDUM IN SUPPORT

Per Rule 240(a), SCACR, Respondent requests an extension of time of thirty (30) days to file her initial brief and designation of matter, which are currently due on December 9, 2020. Case law concerning an extension of time under Rule 240(a) is sparse. But Rule 240(a) states: “This Rule governs all motions or petitions filed in the appellate court, including but not limited to: motions for extension of time...” Rule 240(a), SCACR. All motions filed in an appellate court shall be written, state the grounds for the motion, and comply with Rule 267. Rule 240(c), SCACR. All motions shall have a certificate of service, a memorandum with citations of authority in support of the motion, and an affidavit in support of the motion if the Record on Appeal or Appendix has not been filed or if the facts relied upon in support of the motion are not contained in the Record on Appeal or Appendix. Rule 240(c)(1)-(3), SCACR.

Respondent requests this extension to ensure compliance with the Appellate Court Rules. Further, Respondent’s counsel has another filing due with this Court on December 10, 2020, and has or will have court hearings in other matters in six of the eight business days leading up to the December 9, 2010 deadline. Although neither a Record on Appeal nor an Appendix has been filed, Respondent bases her request on Rule 240(a) rather than any facts involved in this appeal. Therefore, Respondent has not filed an affidavit in support of the motion. If the Court disagrees and requires an affidavit, Respondent requests an opportunity to amend this motion to include one.

[signature block is on the next page]

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Drew Walker", written over a horizontal line.

Drew B. Walker, Esq.

Kevin Maroney, Esq.

Rogers Lewis Jackson Mann & Quinn

P.O. Box 11803

Columbia, SC 29211

(803) 256-1268 (Drew Walker)

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Attorneys for Respondent,

Maria Hernandez

November 30, 2020

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Maria Hernandez.....Respondent,

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Mary V. Fields, Dora Bennett, Shaakira Saffir
a/k/a Shaakira Saffir Nia Rashad
f/k/a Audrey I. Knight, Defendants

Of whom Mary V. Fields and Dora Bennett are Respondents
and Shaakira Saffir is the.....Appellant.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of Respondent Maria Hernandez's Motion for Extension of Time upon Appellant by depositing a copy of the document in the U.S. mail, postage prepaid, on November 30, 2020 and addressed to:

Mary Patricia Crawford

PO Box 654
Walterboro, SC 29455
Attorney for Appellant Saffir

[signature block is on the next page]

Mailed: November 30, 2020

A handwritten signature in cursive script that reads "Kevin Maroney". The signature is written in black ink and is positioned above the printed name and contact information.

Kevin Maroney
Rogers Lewis Jackson Mann & Quinn
Associate Attorney
PO Box 11803
Columbia, SC 29211

ROGERS LEWIS

ATTORNEYS AT LAW

Kevin Maroney
Direct: (803) 978-2832
kmaroney@rogerslewis.com

November 30, 2020

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SC Court of Appeals

Via Hand Delivery

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201


RE: *Maria Hernandez, Respondent v. Mary V. Fields, Dora Bennett, Shaakira Saffir
a/k/a Shaakira Saffir Nia Rashad f/k/a Audrey I. Knight, Defendants
Of whom Mary V. Fields and Dora Bennett are Respondents and
Shaakira Saffir is the Appellant
Appellate Case No. 2020-001301*

Dear Ms. Kitchings:

Enclosed is an original and six copies of Respondent Maria Hernandez's Motion for Extension of Time. The Certificate of Service and the Motion fee of \$50.00 also are enclosed. An additional copy is enclosed as well. Our office requests that this additional copy be stamped for our records.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,



Kevin Maroney
Associate Attorney
ROGERS LEWIS JACKSON MANN & QUINN, LLC