

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Dec 09 2020**

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable James B. Jackson, Jr., Master-in-Equity

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Case No. 2020-001254

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Kacey Green and Charinrath Green,..... Appellants-Respondents,

v.

Mervin Lee Johnson,.....Respondent-Appellant.

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**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

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Pursuant to Rule 263(b), SCACR, counsel for Respondent-Appellant, hereby moves for a thirty (30) day extension of time in which to file his initial brief. Respondent-Appellant received a copy of all available transcripts as of November 9, 2020. Thus, the current deadline is December 9, 2020. Concurrent with this request, Respondent-Appellant filed his Motion to Hold Appeals in Abeyance. This request for additional time will allow the Court to consider that motion, which argues that Appellants-Respondents' timely S.C.R.Civ.P. 59 Motion for Reconsideration filed shortly before service of their Notice of Appeal renders their appeal untimely. The parties' initial briefs would be premature if submitted before the trial court is afforded the opportunity to consider and rule on the numerous legal and factual issues raised by Appellants-Respondents' Rule 59 motion. Therefore, Respondent-Appellant respectfully requests an additionally thirty (30) day extension for a new deadline of Friday, January 8, 2021.

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By:



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Spartanburg, South Carolina

December 9, 2020

***Other Counsel of Record:***

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**PROOF OF SERVICE**

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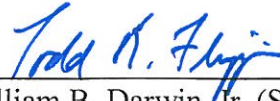
The undersigned hereby certifies that on the 9th day of December, 2020, he has served the Motion for Extension of Time in this matter e-mailing copies of the same to the following addresses:

Court Administration  
1220 Senate Street, Suite 200  
Columbia, SC 29201  
tpclark@sccourts.org

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
ctappfilings@sccourts.org

RESPECTFULLY SUBMITTED,

By:



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December 9, 2020

**VIA ELECTRONIC MAIL ONLY**

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

RE: *Kacey Green v. Mervin Lee Johnson*  
App. Case No. 2020-001254  
Our File No. 15580

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**Dec 09 2020**

**SC Court of Appeals**

Dear Ms. Kitchings:

Please find attached with this correspondence the Respondent-Appellant's Motion for Extension of Time to File Initial Brief, along with the Proof of Service for the same.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

Todd R. Flippin

cc: David R. Williams, Esq.(via email only)  
Charlie H. Williams III, Esq. (via email only)  
Virginia W. Williams, Esq. (via email only)  
E. Mason West, Esq. (via email only)  
S.C. Court of Administration (via US Mail)