

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master-In-Equity

Appellate Case No. 2020-001127

1st Franklin Financial
Corporation

Respondent,

v.

Roby A. Adams

Appellant.

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTER FOR RECORD

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Attorney for Appellant

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Dec 17 2020
SC Court of Appeals

Appellant files this Motion for an Extension of Time to File Appellant's initial brief and designation of matter for the record. Those documents were due yesterday, December 16, 2020, and versions of those documents were actually filed with the court on that date, but at least Appellant's initial brief was incomplete, and perhaps the designation of matter as well, due to circumstances beyond Appellant's counsel's control, since his computer crashed more than once due to unknown reasons and some of the work that he had completed was lost in those crashes and had to be typed again, thereby causing him to be unable to file complete versions of those documents in a timely manner. In particular, information in the Table of Authorities was lost in the crash, and due to the lost time, Appellant's counsel was unable to proofread the Initial Brief and make any necessary changes or corrections.

Due to the lateness of the hour, since this Motion is being completed after midnight on December 17, 2020, Appellant's counsel is unable to contact opposing counsel to determine whether or not they would consent to this motion, but perhaps they can inform the court clerk today, perhaps via email, if they are willing to consent to this Motion.

WHEREFORE, Appellant respectfully requests that the court take the following actions:

- A. Allow Appellant one more day, until the end of the day today, December 17, 2020 to make any necessary changes or additions to amended versions of Appellant's Initial Brief and Designation of Matter for the Record.
- B. For such other relief as may seem appropriate to the court.

Dated this December 17, 2020

/s/ John R. Cantrell, Jr.
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PROOF OF SERVICE

All counsel of record have been served with this Motion for Extension of Time by simultaneous email service to their email address of record indicated below on this December 17, 2020.

Email addresses served:

Robert C. Osborne III at his email address of robertosborne@parkerpoe.com and Robert H.

Jordan at his email address of robertjordan@parkerpoe.com.

/s/ John R. Cantrell, Jr.
Attorney for Appellant