

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

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DEC 14 2020

The Honorable Carmen T. Mullen, Circuit Court Judge

SC Court of Appeals

Case No. 2020-CP-07-00091
Appellate Case No. 2020-000883

Barbara Killingsworth and Brian Killingsworth.....Respondents,

v.

Stokes Brown Toyota of Hilton Head.....Appellant.

MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER

Under Rules 240 and 263(b) of the SCACR, Respondent moves for a thirty (30) day extension of time in which to file its Initial Brief and Designation of Matter to be included in the Record on Appeal.

This is Respondents' first request for an extension regarding this Brief. This Motion is based on other case demands and work obligations of Respondents' attorneys. Respondents has conferred with opposing counsel and counsel consents to the requested extension.

Respondents' Brief and Designation of Matter were due on November 20, 2020.

Respondents respectfully requests an extension of thirty (30) days until December 20, 2020.

December 7, 2020

s/Michael Todd Loftis

Christy Kellerhals (SC Bar No 102066)

Michael Todd Loftis (SC Bar No 68545)

HawkLaw, PA

PO Box 5048

Spartanburg, SC 29304

(864) 574-8801

Attorneys for Respondents Barbara Killingsworth
and Brian Killingsworth

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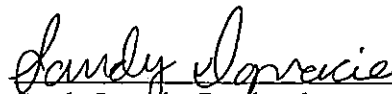
v.

Stokes Brown Toyota of Hilton Head.....Appellant.

PROOF OF SERVICE

I, Sandy Ignacio, paralegal to attorney for Appellant, certify that I have served a copy of attorney Michael Todd Loftis's Notice of Appearance as counsel and Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal by depositing a copy in the U.S. Mail, postage prepaid, on 12/8/2020 addressed to attorneys of record, Brandfor N. Martin, Esq. and Laura W.H. Teer, Esq, Bradford Neal Martin and Associates, PA, PO Box 10410, Greenville, SC 29603

December 9, 2020


Sandy Ignacio, Paralegal
HawkLaw, PA
PO Box 5048
Spartanburg, SC 29304
(864) 574-8801



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December 7, 2020

The Honorable Jenny Abott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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DEC 14 2020

SC Court of Appeals

Re: *Barbara Killingsworth v. Stokes Brown Toyota*
Appellate Case No. 2020-000883

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of attorney Michael Todd Loftis's Notice of Appearance as counsel and Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter in the above captioned matter. Please file the original with your Court and return the clocked copies to me in the enclosed envelope.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Christy L. Kellerhals

CLK/si
Enclosures

cc: Brandfor N. Martin, Esq.
Laura W.H. Teer, Esq.

Mailing Address:
P.O. Box 5048
Spartanburg, SC 29304

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