

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Jan 05 2021**

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable R. Lawton McIntosh

Case No. 2020-001126

Kim Likins, ..... Respondent/Appellant,

v.

C.C. "Skip" Hoagland, ..... Appellant/Respondent.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE OUT OF TIME  
APPELLANT/RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF  
MATTER TO BE INCLUDED IN RECORD ON APPEAL

Appellant/Respondent hereby moves pursuant to Rule 240 and 263(b), SCACR, requesting the Court accept late service of this motion (and Appellant/Respondent's initial brief and matter to be designation to be included in the record on appeal) and for a 1-day extension of the time from the date it was previously due in which to serve and file the Appellant/Respondent's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension and leave to file this motion out of time, as the following shows:

1. Appellant/Respondent's initial brief and designation of matter was due for filing and service on yesterday, January 4, 2021.
2. The current COVID-19 pandemic and its attendant disruption of the ordinary functioning of business has disrupted Appellant/Respondent's counsel's schedule and ordinary pace of work, affecting several matters, including the completion of the initial brief in this case. Specifically, counsel has been working from home and utilizes a virtual private network (VPN) to access his office server. The VPN failed to grant access to the server yesterday evening so counsel could not access the document for finalization, service and filing. VPN access was restored today.
3. Appellant/Respondent's initial brief and designation of matter was due Monday, January 4, 2021. If the request is granted, Appellant/Respondent's initial brief and designation of matter to be included in the record on appeal will be due on Tuesday, January 5, 2021, today.

4. This is the third extension Appellant/Respondent has requested in this appeal.
5. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant/Respondent prays for an order extending the time in which to serve and file the Appellant/Respondent's initial brief and designation of matter to be included in the record on appeal by 1 day, to January 5, 2021.

January 5, 2021

Respectfully submitted,

/s/ Taylor Smith  
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