

RECEIVED

Feb 01 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge
Case No.: 2020-CP-07-00768

Appellate Case No. 2020-001500

Dana Advocaat, both individually and as Trustee of the Advocaat
Living Trust dated March 7, 2019.....Respondent,

v.

Community Services Associates, Inc.....Appellant.

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263, SCACR, the Appellant, by and through its undersigned counsel, hereby moves this Court for an Order granting an Extension of Time for filing Appellant's Initial Brief ("Initial Brief") and Designation of Matters to be Included in the Record on Appeal. The grounds for this Motion are as follows:

1. Appellant received the transcript of the lower court proceeding from the court reporter via electronic mail on December 30, 2020. (*see email attached as Exhibit A*).
2. Due to the ongoing state of emergency in South Carolina associated with the COVID-19 pandemic, Appellant has experienced unforeseen delays in the preparation of its Initial Brief, as well in administrative matters regarding the preparation and copying of the documents to be included in Appellant's Designation of Matters.

3. Further, Appellant is informed and believes this case presents several novel issues under South Carolina law, and Appellant would request an extension of time in order to fully brief the Court on any applicable authority which may exist with regard to the issues presented.

4. Counsel for Respondent have consented to Appellant's request for an extension in which to file its Initial Brief and Designation of Matters.

WHEREFORE, Appellant respectfully requests this Court to extend the time to file Appellant's Initial Brief and Designation of Matters to be Included in the Record on Appeal, an additional fourteen (14) days from today, until February 15, 2021.

This 1st day of February, 2021.

Respectfully submitted,

COPELAND, STAIR, KINGMA & LOVELL, LLP

s/Douglas W. MacKelcan

Douglas W. MacKelcan

S.C. Bar No.: 76332

Michael C. Masciale

S.C. Bar No.: 103819

40 Calhoun Street, Suite 400

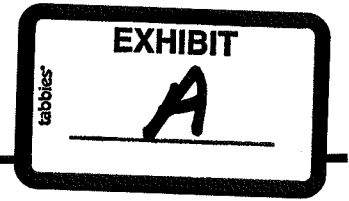
Charleston, SC 29401

dmackelcan@cskl.law

mmasciale@cskl.law

Phone: (843) 727-0307

*Attorneys for Appellant Community Services
Associates, Inc.*



From: Richardson, Kay H. <KRichardson@sccourts.org>
Sent: Wednesday, December 30, 2020 3:00 PM
To: Teague, Mebane A.; Rewt, Teri J.
Cc: Transcripts
Subject: Re: Dana Advocaat v. Community Services Associates, Inc.; Beaufort County Case No.: 2020-CP-07-00768; Appellate Case No.: Pending; CSKL File No.: 60386
Attachments: advocaatvCSA.080420.cert.pdf; advocaatvCSA.080420.inv.docx; advocaatvCSA.080420.tor.pdf

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Enclosed please find the transcript in this matter. I have also attached a signed Certificate and invoice.

If you need a hard copy forwarded by regular mail or have any issues downloading the documents, please let me know.

Thanks,

Kay H. Richardson

From: Teague, Mebane A. <mteague@cskl.law>
Sent: Wednesday, November 11, 2020 3:47:24 PM
To: Richardson, Kay H.; Rewt, Teri J.
Cc: Court Of Appeals Filings; 'Ian.Ford@FordWallace.com'; 'Ainsley.Tillman@FordWallace.com'; Mackelcan, Douglas W.; Masciale, Michael C.
Subject: RE: Dana Advocaat v. Community Services Associates, Inc.; Beaufort County Case No.: 2020-CP-07-00768; Appellate Case No.: Pending; CSKL File No.: 60386

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Thank you Kay.

Mebane
Mebane Teague
Paralegal
d: 843.266.8218 | f: 843.727.2995
mteague@cskl.law |
https://linkprotect.cudasvc.com/url?a=https%3a%2f%2furldefense.com%2fv3%2f__http%3a%2f%2fwww.cskl.law__%3b%21%21JHVHxrUang%21Fpv6WsbDM5iyEWz66uvD6H_rqdOgEeX3ruZOsmtEkHJbRriqAXG5jU_6Yb6UPB-fSnE%24&c=E,1,YTaQuQIJOAtkb5GDzdPRPi-s6grHwyGM7IsxlSpaejwnihYPGs-hB5s7jLW4S7WuxgFXXAOTklr74z_tlfv9IQ7BEw_XaxrEQD78INKHx1Dg5goaY6nw&typo=1
40 Calhoun Street, Suite 400, Charleston, SC 29401

RECEIVED

Feb 01 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge
Case No.: 2020-CP-07-00768

Appellate Case No. 2020-001500

Dana Advocaat, both individually and as Trustee of the Advocaat
Living Trust dated March 7, 2019.....Respondent,

v.

Community Services Associates, Inc.....Appellant.

PROOF OF SERVICE

I certify that I have served Appellant’s *Motion for Extension of Time* upon the parties below by electronic mail only, on February 1, 2021, addressed as follows:

Ian S. Ford, Esq.
Ainsley F. Tillman, Esq.
Ford Wallace Thompson, LLC
715 King Street
Charleston, SC 29403
Ian.Ford@FordWallace.com
Ainsley.Tillman@FordWallace.com

[SIGNATURE PAGE TO FOLLOW]

This 1st day of February, 2021.

COPELAND, STAIR, KINGMA & LOVELL, LLP

s/Douglas W. MacKelcan

Douglas W. MacKelcan

S.C. Bar No.: 76332

Michael C. Masciale

S.C. Bar No.: 103819

40 Calhoun Street, Suite 400

Charleston, SC 29401

dmackelcan@cskl.law

mmasciale@cskl.law

Phone: (843) 727-0307

*Attorneys for Appellant Community Services
Associates, Inc.*

6496861v.1

LAW OFFICES
COPELAND, STAIR, KINGMA & LOVELL, LLP

DOUGLAS W. MACKELCAN
MICHAEL C. MASCIALE

DIRECT DIAL NUMBERS
(843) 266-8228
(843) 266-8223

E-MAIL ADDRESSES
dmackelcan@cskl.law
masciale@cskl.law

40 Calhoun Street, Suite 400
CHARLESTON, SC 29401

TELEPHONE (843) 727-0307
FAX (843) 727-2995

www.cskl.law

ATLANTA OFFICE

191 Peachtree Street, N.E.
Suite 3600
Atlanta, Georgia 30303-1740
(404) 522-8220

REPLY TO SC OFFICE

February 1, 2021

VIA EMAIL ONLY

Tyler Clark
Appeals Specialist
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201
tpclark@sccourts.org

RECEIVED
Feb 01 2021
SC Court of Appeals

Re: Dana Advocaat v. Community Services Associates, Inc.
Beaufort County Case No.: 2020-CP-07-00768
Appellate Case No.: 2020-001500
CSKL File No.: 4610-60386

Dear Mr. Clark:

Please find attached for the Court's consideration, Appellant's Motion for Extension of Time (*to file Initial Brief and Designation of Matters to be Included in the Record on Appeal*).

By copy of this letter, we are copying Respondent's counsel on this letter and enclosures. Please let us know if the Court needs anything further at this time. If you have any questions or concerns, please do not hesitate to give me a call.

Sincerely,

s/Douglas W. MacKelcan

DOUGLAS W. MACKELCAN
MICHAEL C. MASCIALE

DWM:tjr
Enclosures

cc: Ian S. Ford, Esq.; Ainsley F. Tillman, Esq. (via email only – with enclosures)
Ian.Ford@FordWallace.com; Ainsley.Tillman@FordWallace.com