

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Feb 24 2021

SC Court of Appeals

Appeal from Marlboro County
Court of Common Pleas

The Honorable Paul M. Burch, Circuit Court Judge

Case No. 2016-CP-34-00072

Appellate Case No. 2020-000989

Daisy Frederick,

Respondent,

v.

Daniel Lee McDowell,

Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO SERVE AND FILE FINAL
BRIEF**

ANASTOPOULO LAW FIRM, LLC
Eric M. Poulin (SC #100209)
Roy T. Willey, IV (SC #101010)
Alexis W. McCumber (SC #101611)
32 Ann Street
Charleston, South Carolina 29403
Phone (843) 614-8888
Facsimile (843) 494-5536

Attorneys for the Respondent

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW RESPONDENT Daisy Frederick, by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file and serve her final brief.

WHEREFORE, Respondent respectfully moves this Honorable Court to grant her an additional thirty (30) days to file/serve her final brief. With the extension requested herein, the new deadline for filing and serving the same would be March 26, 2021 according to the undersigned's calculations.

Respectfully submitted,

ANASTOPOULO LAW FIRM, LLC

s/ Alexis W. McCumber

Alexis W. McCumber (SC #101611)
Eric M. Poulin (SC #100209)
Roy T. Willey, IV (SC #101010)
Anastopoulos Law Firm, LLC
32 Ann Street
Charleston, South Carolina 29403
(843) 614-8888
Facsimile (843) 494-5536

Attorneys for Respondent

February 24, 2021
Charleston, SC

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PROOF OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Motion for Extension in the above referenced matter has been served upon counsel of record via AIS email [Pursuant to the Court's May 29, 2020, Operation of the Appellate Courts During the Coronavirus Emergency Order] to the following.

R. Hawthorne Barrett: tbarrett@turnerpadget.com

s/ Alexis W. McCumber
Alexis W. McCumber (SC #101611)
32 Ann Street
Charleston, South Carolina 29403
Phone (843) 614-8888
Facsimile (843) 494-5536

Attorney for the Respondent

February 24, 2021
Charleston, SC



Alexis McCumber <alexis@akimlawfirm.com>

Frederick v. McDowell - Appellate Case No. 2020-000989 - Notice of Appearance and Motion for Extension

3 messages

Alexis McCumber <alexis@akimlawfirm.com>

Wed, Feb 24, 2021 at 12:20 PM

To: tbarrett@turnerpadget.com

Cc: TeamMcCumber <teammccumber@googlegroups.com>, "Roy, Eric, Matt" <teamrem@googlegroups.com>

Hawthorne,

Please find the following attached:

- 1. Notice of Appearance and Proof of Service
- 2. Motion for Extension of Time to File and Serve Respondent's Final Brief and Proof of Service

I look forward to working with you on this matter.

--

Alexis W. McCumber

Division Chair, Trial Attorney

Transportation and Insurance Litigation Division

Anastopoulos Law Firm LLC

32 Ann Street | Charleston, SC 29403

Tel: 843-614-8888 | Fax: 843-494-5536

www.akimlawfirm.com | alexis@akimlawfirm.com

Office Locations: Charleston | N. Charleston | Florence | Columbia | Greenville | Myrtle Beach | Raleigh, NC

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2 attachments

Notice of Appearance.pdf
69K

Respondent's Request for Extension to File Final Brief.pdf
127K

Barrett, Thorne <TBarrett@turnerpadget.com>

Wed, Feb 24, 2021 at 12:27 PM

To: Alexis McCumber <alexis@akimlawfirm.com>

If you want to let the court know that I consent to the extension, that's fine with me.



R. Hawthorne Barrett
Attorney
PO Box 1473 | Columbia, SC 29202
[1901 Main Street, Suite 1700 | Columbia, SC 29201](#)
803-227-4219 | Fax 803-400-1454
tbarrett@turnerpadget.com
[Bio](#) | [vCard](#) | [Location](#)

[Quoted text hidden]

Alexis McCumber <alexis@akimlawfirm.com>
To: "Barrett, Thorne" <TBarrett@turnerpadget.com>

Wed, Feb 24, 2021 at 12:28 PM

Thanks, Thorne.
[Quoted text hidden]