

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable Roger M. Young, Circuit Court Judge

Case No. 2020-CP-08-00718

RECEIVED

Mar 12 2021

SC Court of Appeals

Bethany Aloha Rich,

Appellant,

v.

New Heights Property Management,

Respondent.

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE APPELLANT’S INITIAL
BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL**

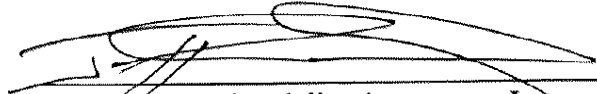
Appellant hereby moves pursuant to Rule 263(b), SCACR, for a twenty-one (21) day extension of the time in which to serve and file Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. Undersigned counsel for Appellant received the transcript on February 12, 2021. Therefore, the deadline for service and filing of Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal appears to be March 15, 2021.

The undersigned counsel has been delayed by unexpected personal and professional obligations. This is the first extension that Appellant has sought. Appellant’s counsel believes that there is good cause to grant the requested twenty-one (21) day extension to April 5, 2021.

WHEREFORE, the Appellant prays that this Court enter an order extending the time in

which to serve and file his Initial Brief and Designation of Matter to be Included in the Record on Appeal to April 5, 2021.

Respectfully submitted,



Jeffrey W. Kuykendall – Attorney at Law

S.C. Bar No. 102538

127 King St., Ste. 208

Charleston, SC 29401

Phone: (843) 790-5182

Facsimile: (866) 733-1909

Jwkuykendall@jwklegal.com

Attorney for Appellant

At Charleston, South Carolina

This the 12th day of March, 2021.

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SC Court of Appeals

**APPEAL FROM BERKELEY COUNTY
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Appellant,

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New Heights Property Management,

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PROOF OF SERVICE

The undersigned hereby certifies that he served counsel for the Respondents, New Heights Property Management, through its attorney, Scott Parker Riddell, with a copy of the *Motion for Extension of Time to Serve and File Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal* by mailing a copy of the same by United States Mail with first class postage to the following address on March 12, 2021:

Scott Parker Riddell
PMC Law Firm,
504 W. 5th North Street
Summerville, SC 29483



Jeffrey W. Kuykendall

At Charleston, SC

This the 12th day of March, 2021.

JEFFREY W. KUYKENDALL
ATTORNEY AT LAW

127 King St.
Suite 208
Charleston, SC 29401

Phone: 843.790.5182
Facsimile: 866.733.1909
Jwkuykendall@jwklegal.com

March 12, 2021

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SC Court of Appeals

Via U.S. Mail and Facsimile
Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
(803) 734-1839

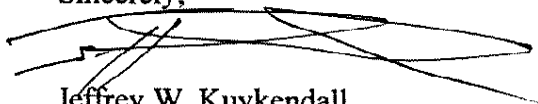
Re: *Bethany Aloha Rich v. New Heights Property Management*
Berkeley County Case No. 2020-CP-08-00718

Dear Ms. Kitchings:

Enclosed please find a Motion for Extension of Time to Serve and File Appellant's Initial Brief and Designation of Matter to Be Included in the Record on Appeal for filing the above-referenced case. We have also enclosed the Proof of Service and the required \$50.00 filing fee.

Please file the enclosed documents and return copies to my office in the enclosed self-addressed envelope. Thank you for your assistance in this matter.

Sincerely,


Jeffrey W. Kuykendall

Enclosures (as stated)

cc: Scott Riddell (w/enclosures)
Client (via email only) (w/enclosures)

RECEIVED

Mar 12 2021

SC Court of Appeals

FAX COVER PAGE

To: Clerk of Court
South Carolina Court of Appeals

From: Jeffrey W. Kuykendall – Attorney at Law

Date: March 12, 2021

RE: *Bethany Aloha Rich v. New Heights Property Management*
Berkeley County Case No. 2020-CP-08-00718

Fax Number: 803.734.1839

Pages: _5_ including cover page

Sender: If there is a problem with this transmission, please contact Jeffrey W. Kuykendall at (843) 790-5182.