

**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

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.

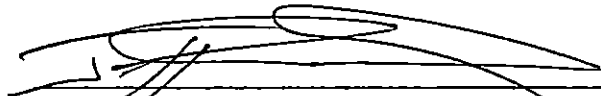
The undersigned counsel has been delayed by unexpected personal and professional obligations. This is the first extension that Appellant has sought. Appellant's counsel believes that there is good cause to grant the requested twenty-one (21) day extension to April 5, 2021.

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

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SC Court of Appeals

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 12<sup>th</sup> day of March, 2021.

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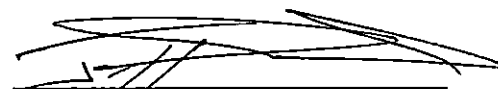
New Heights Property Management,

Respondent.

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. 5<sup>th</sup> North Street  
Summerville, SC 29483

  
\_\_\_\_\_  
Jeffrey W. Kuykendall

At Charleston, SC

This the 12 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

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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)

Jeffrey W. Kuykendall  
Attorney at Law  
127 King St., Ste. 208  
Charleston, SC 29401

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MAR 15 2021

**SC Court of Appeals**

Honorable Jenny A. Kitchings  
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