

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

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-CP-23-01213

JAMES EARL TEGELER,

Appellant,

v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

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

Pursuant to Rule 240, SCACR, Appellant James Earl Tegeler moves for an extension of time in which to serve and file Appellant's Initial Brief and Designation of Matter to be included in the Record of Appeal ("Designation of Matter"). Appellant requests an extension of sixty (60) days to file the Initial Brief and Designation of Matter which are currently due on March 19, 2021. This request is the first request for an

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SC Court of Appeals

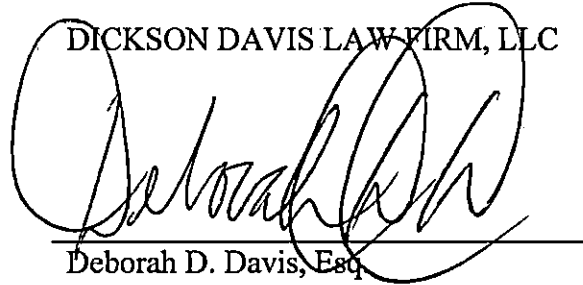
extension filed by Appellant.

The grounds for this motion are that other impending professional matters and obligations have created a need for additional time to prepare Appellant's Initial Brief and Designation of Matter. A sixty (60) day delay will not prejudice the rights of any of the parties. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than May 19, 2021.

For these reasons, Appellant requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until May 19, 2021.

Respectfully submitted this 18 day of March, 2021.

DICKSON DAVIS LAW FIRM, LLC



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ATTORNEY FOR APPELLANT

**PROOF OF SERVICE OF MOTION FOR EXTENSION OF TIME FOR
APPELLATE TO SERVE AND FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL**

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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Case No. 2020-CP-23-01213

JAMES EARL TEGELER,

Appellant,

v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Motion for Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to be included in the Record on Appeal on Respondents **CHARLOTTE COLLIER, HANNAH ELIZABETH COLLIER, LINDA SMITH, NORTHGATE BAPTIST CHURCH** electronically and by depositing a copy of it in the United States Mail, postage prepaid, or by South Carolina Supreme Court Order 2020-05-29-02, on March 18, 2021, addressed to the attorney of record, to the following address(es):

Northgate Baptist Church
c/o Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Charles E. McDonald & S. Michael Nail
300 North Main Street

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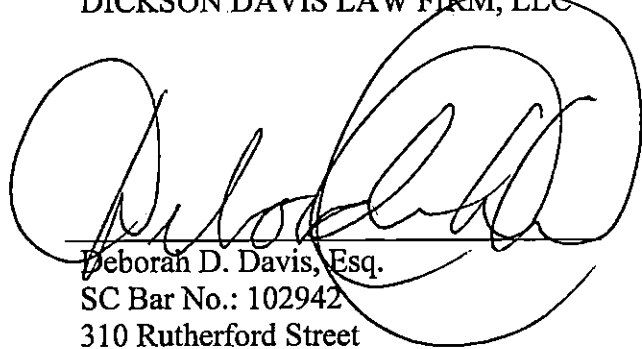
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Daniel R. Hughes
457-B Pennsylvania Avenue
P.O. Box 449
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Respectfully submitted this . 18 day of March , 2021 .

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ATTORNEY FOR APPELLANT



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DICKSON DAVIS LAW FIRM

NOTICE OF MOTION

March 18, 2021

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

VIA EMAIL CTAPPFILINGS@SCCOURTS.ORG

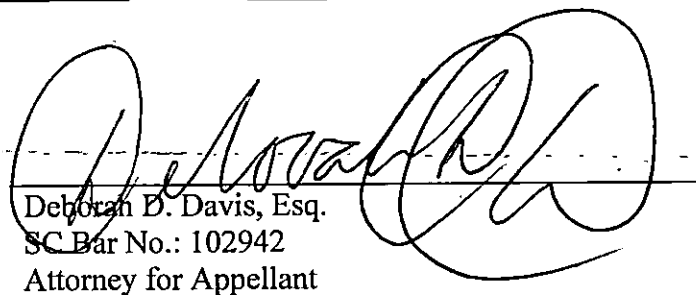
Re	:	<u>Tegeler v. Collier et al.</u>
Case No.	:	<u>2020-CP-23-01213</u>
Appellate Case No.	:	<u>2020-001525</u>
File Id.	:	<u>2018-01-123</u>

Dear Clerk of Court:

This letter is to inform you of the motion for extension of time for Appellant to file a brief and designated matter in sixty (60) days by May 19, 2021. The requisite \$50.00 has been waived accordingly. See attached.

Please let me know what further you require from me at this time. Thank you for assistance with this matter.

Respectfully submitted this 18 day of March, 2021.



Deborah D. Davis, Esq.
SC Bar No.: 102942
Attorney for Appellant

cc: Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
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ATTORNEYS FOR THE RESPONDENTS

/ddd

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Greenville, SC 29609**

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