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**Jun 15 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

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Case No.: 2020-CP-23-01213  
Appellate Case No: 2020-001525

James Earl Tegeler.....Appellant

v.

Charlotte Collier, Hannah Elizabeth Collier, Linda Smith, Northgate Baptist Church  
Respondents

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**MOTION FOR EXTENSION OF TIME WITHIN WHICH  
TO SERVE AND FILE THE INITIAL BRIEF OF RESPONDENT**

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Respondents (“Hannah Elizabeth Collier and Linda Smith”), through its undersigned counsel, would respectfully show unto this Court as follows:

The Respondent’s Brief is due to be served and filed no later than June 23, 2021. However, due to counsel’s workload, counsel requests an extension of time in which to serve and file the Respondent’s Brief for fifteen (15) days.

Respondents’ request for an extension is not intended for purposes of delay.

WHEREFORE, Respondents pray that this Court grant their Motion for Extension of Time within which to serve and file the Respondents' Brief in this case for an additional fifteen (15) days from June 23, 2021; and for such other relief as this Court may deem just and proper.

Respectfully submitted,

DUGGAN & HUGHES, LLC

*Daniel R. Hughes*

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DANIEL R. HUGHES (SC Bar #72547)  
457-B Pennsylvania Avenue  
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ATTORNEYS FOR RESPONDENTS

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**PROOF OF SERVICE**

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I certify that I have served Respondents' Hannah Elizabeth Collier and Linda Smith Motion for Extension of Time to serve and file the Respondent's Brief on Appellant, James Earl Tegeler, and Respondents, Charlotte Collier and Northgate Baptist Church, electronically and by depositing a copy of it in the United States Mail, postage prepaid to the following:

Deborah D. Davis, Esquire  
310 Rutherford Street  
Greenville, SC 29609  
Attorney for Appellant  
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Charles E. McDonald, Esquire  
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P.O. Box 2757  
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1000 East North Street, Suite 200  
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Attorney for Respondent Charlotte Collier  
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ELIZABETH COLLIER

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SC Court of Appeals

**DUGGAN & HUGHES, LLC**  
ATTORNEYS AND COUNSELORS AT LAW

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June 15, 2021

**Via Email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

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

**Re: James Earl Tegeler v. Charlotte Collier, Hannah Elizabeth Collier, Linda  
Smith and Northgate Baptist Church**  
**C.A. No.: 2020-CP-23-01213**  
**Appellate Case No.: 2020-001525**  
**File No.: DH18.0098**

Dear Sir or Madam:

Enclosed herewith please find a Motion for Extension of Time for Respondents, Hannah Elizabeth Collier and Linda Smith, to file their Brief along with the filing fee of \$50.00.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

DUGGAN & HUGHES, LLC



Daniel R. Hughes

DRH/tab  
Enclosure

cc: Deborah D. Davis, Esquire  
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