

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

JUN 17 2021

SC Court of Appeals

The Honorable Alex Kinlaw, Circuit Court Judge

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

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

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

DANIEL R. HUGHES (SC Bar #72547)

457-B Pennsylvania Avenue

P. O. Box 449

Greer, SC 29652-0449

Telephone: (864) 334-2500

Facsimile: (864) 879-0149

ATTORNEYS FOR RESPONDENTS

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

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

RECEIVED
JUN 17 2021
SC Court of Appeals

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 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
d.davis@dicksondavislaw.com

Charles E. McDonald, Esquire
S. Michael Nail, Esquire
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
300 North Main Street
P.O. Box 2757
Greenville, SC 29602
Attorney for Respondent North Gate Baptist Church
charles.mcdonald@ogletreedekins.com
michael.nail@ogletreedekins.com

Amy Snyder, Esquire
Clawson & Staubes, LLC
1000 East North Street, Suite 200
Greenville, SC 29601
Attorney for Respondent Charlotte Collier
asnyder@clawsonandstaubes.com

Duggan & Hughes, LLC

Daniel R. Hughes

DANIEL R. HUGHES (SC Bar #72547)
457-B Pennsylvania Avenue
P. O. Box 449
Greer, SC 29652-0449
Telephone: (864) 334-2500
Facsimile: (864) 879-0149
ATTORNEYS FOR RESPONDENTS
CHARLOTTE COLLIER and HANNAH
ELIZABETH COLLIER

DUGGAN & HUGHES, LLC
ATTORNEYS AND COUNSELORS AT LAW

John B. Duggan
Daniel R. Hughes
Evan C. Bramhall

457-B Pennsylvania Avenue
Greer, South Carolina 29650
Telephone: (864) 879-0144 or (864) 334-2500
Facsimile: (864) 879-0149

Mailing Address
Post Office Box 449
Greer, S.C. 29652

June 15, 2021

RECEIVED

JUN 17 2021

SC Court of Appeals

Via Email to 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

D/ Daniel R. Hughes

Daniel R. Hughes

DRH/tab
Enclosure

cc: Deborah D. Davis, Esquire
310 Rutherford Street
Greenville, SC 29609
Attorney for Appellant

Charles E. McDonald, Esquire
S. Michael Nail, Esquire
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
300 North Main Street
P.O. Box 2757
Greenville, SC 29602
Attorney for Respondent North Gate Baptist Church

Amy Snyder, Esquire
Clawson & Staubes, LLC
1000 East North Street, Suite 200
Greenville, SC 29601
Attorney for Respondent Charlotte Collier

DRH
DUGGAN & HUGHES, LLC
Post Office Box 449
Greer, South Carolina 29652-0449

RECEIVED

JUN 17 2021

SC Court of Appeals

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

NEOPOST
06/15/2021
US POSTAGE \$001.05



ZIP 29650
041L10423940