

**RECEIVED**

JUN 24 2021

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY  
COURT OF COMMON PLEAS

**SC Court of Appeals**

THE HONORABLE GORDON G. COOPER  
CASE NO. 2020-CP-42-02447  
APPELLATE CASE NO.: 2021-000516

Larry Bright .....Appellant

v.

Heather D. Davis and Midfirst Bank .....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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Respondent (“Heather D. Davis”), 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 28, 2021. However, due to counsel’s workload, counsel requests an extension of time in which to serve and file the Respondent’s Brief for thirty (30) days.

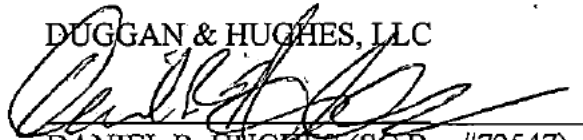
Respondent’s request for an extension is not intended for purposes of delay.

WHEREFORE, Respondent prays that this Court grant their Motion for Extension of Time within which to serve and file the Respondent’s Brief in this case for an additional thirty

(30) days from June 28, 2021; and for such other relief as this Court may deem just and proper.

Respectfully submitted,

DUGGAN & HUGHES, LLC

A handwritten signature in black ink, appearing to read "Daniel R. Hughes", is written over a horizontal line.

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 RESPONDENT.

STATE OF SOUTH CAROLINA  
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**PROOF OF SERVICE**

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I certify that I have served Respondent Heather D. Davis Motion for Extension of Time to serve and file the Respondent’s Brief on Appellant, Larry Bright, and Respondent, Midfirst Bank, electronically and by depositing a copy of it in the United States Mail, postage prepaid to the following:

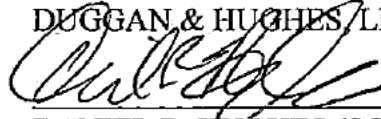
Richard H. Rhodes, Esquire  
William H. Rhodes, Esquire  
260 North Church Street  
Spartanburg, SC 29306  
burtslaw@btrlawfirm.com

Ronald G. Bruce, Esquire  
P.O. Box 450  
Greer, SC 29650  
Attorneys for Appellant  
rbruce@rbrucelaw.com

Magalie A. Creech, Esquire  
4000 Faber Place Drive, Suite 450  
North Charleston, SC 29405  
Attorney for Respondent Midfirst Bank  
mcreech@finkellaw.com

Respectfully submitted,

DUGGAN & HUGHES/LLC



Date:

6/22/2021

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 RESPONDENT

**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 21, 2021

**RECEIVED**

JUN 24 2021

SC Court of Appeals

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: Larry Bright v. Heather D. Davis and Midfirst Bank**  
**C.A. No.: 2020-CP-42-02447**  
**Appellate Case No.: 2021-000516**  
**File No.: DH20.0140**

Dear Sir or Madam:

Enclosed herewith please find a Motion for Extension of Time for Respondent, Heather D. Davis, to file her 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: Richard H. Rhodes, Esquire  
William H. Rhodes, Esquire  
260 North Church Street  
Spartanburg, SC 29306

Ronald G. Bruce, Esquire  
P.O. Box 450  
Greer, SC 29650  
Attorneys for Appellant

Magalie A. Creech, Esquire  
4000 Faber Place Drive, Suite 450  
North Charleston, SC 29405

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**FIRST CLASS MAIL**

LAW OFFICES DUGGAN & HUGHES, LLC Post Office Box 449 Greer, South Carolina 29652-0449
TO:  Clerk of Court South Carolina Court of Appeals 1220 Senate Street P.O. Box 11629 Columbia, SC 29211

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