

**RECEIVED**  
**Sep 07 2021**  
**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
**In The Court of Appeals**

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

The Honorable Roger M. Young, Circuit Court Judge

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Case No. 2020-CP-08-00718

Bethany Aloha Rich, Appellant,

v.

New Heights Property Management, Respondent.

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MOTION FOR EXTENSION OF TIME TO SERVE AND FILE APPELLANT'S REPLY TO  
RESPONDENT'S INITIAL BRIEF

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Appellant hereby moves pursuant to Rule 263(b), SCACR, for an extension of the time in which to serve and file Appellant's Reply to Respondent's Initial Brief. Respondent, through counsel, filed and served its Initial Brief in this matter on August 27, 2021. The previous day, August 26, 2021, counsel for Respondent filed a Motion to Dismiss, based, in part, on language in the underlying Circuit Court's August 26, 2021 Order stating that Appellant's appeal with this Court was dismissed. Appellant has filed a Return to that Motion.

The undersigned counsel request a short extension of time after this Court's ruling on that Motion to file and serve Appellant's Reply to Respondent's Initial Brief. Appellant's counsel believes that there is good cause to grant the requested extension.

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

which to serve and file its Reply to Respondent's Initial Brief and for such further relief as this Court deems just and proper.

Respectfully submitted,

*/s/ Jeffrey W. Kuykendall* \_\_\_\_\_  
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 7th day of September, 2021.

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**PROOF OF SERVICE**

The undersigned hereby certifies that he served counsel for the Respondent, New Heights Property Management, through its attorney, Scott Parker Riddell, with a copy of the *Appellant's Motion for Extension of Time to Serve and File Reply to Respondent's Initial Brief* via email (attached) on September 7, 2021 to:

Scott.Riddell.Law@gmail.com

/s/ Jeffrey W. Kuykendall \_\_\_\_\_  
Jeffrey W. Kuykendall

At Charleston, SC

This the 7th day of September, 2021.



Jeffrey Kuykendall &lt;jwkuykendall@jwklegal.com&gt;

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**Rich v. New Heights - Motion for Extension of Time to File Reply**

1 message

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**Jeffrey Kuykendall** <JWKuykendall@jwklegal.com>  
To: Scott Riddell <scott.riddell.law@gmail.com>

Tue, Sep 7, 2021 at 3:59 PM

Please find attached the Appellant's Motion for Extension of Time to File Reply to Respondent's Initial Brief.

Sincerely,

**Jeffrey W. Kuykendall****Attorney at Law**

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Charleston, SC 29401

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**Motion for Extension of Time to File Reply Brief.pdf**

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