

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

68130

APPEAL FROM Horry COUNTY
Court of Common Pleas

Ralph P. Stroman
Special Referee

Case No.: 2008-CP-26-6169

Joseph E. Mason, Jr., Appellant

v.

Catherine L. Mason, Joseph E. Mason, Sr.,
Kathy St. Blanchard, Mason Holding
Company, Inc., and Irwin Levine Respondents

RESPONDENTS CATHERINE L. MASON, JOSEPH E. MASON, SR.,
KATHY ST. BLANCHARD, AND MASON HOLDING COMPANY, INC.'S
MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER

J. Jackson Thomas, Esquire
Emma Ruth Brittain, Esquire
THOMAS & BRITTAIN, P.A.
Post Office Box 1290
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(843) 692-2628
ATTORNEYS FOR RESPONDENTS
CATHERINE L. MASON, JOSEPH E.
MASON, SR., KATHY ST. BLANCHARD
AND MASON HOLDING COMPANY,
INC.

April 17, 2013

RECEIVED

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SC Court of Appeals

Counsel for the Defendants, Joseph E. Mason, Sr., Catherine L. Mason, Kathy St. Blanchard and Mason Holding Company, Inc., ("Respondents"), hereby respectfully move the Court, pursuant to Rule 240(a), SCACR, for an additional fifteen (15) day extension of time to file the Initial Brief and Designation of Matter to be included in the Record on Appeal. One fifteen (15) day extension has been granted in this matter and will expire on Friday, April 13, 2013.

The request is based on the schedule and caseloads of the undersigned attorneys and staffing schedules. Respondents respectfully contend that good cause exists for an extension of time to file its Initial Brief and Designation of Matter. Opposing counsel has consented to the request.

Wherefore, Respondents Joseph E. Mason, Sr., Catherine L. Mason, Kathy St. Blanchard and Mason Holding Company, Inc., contend that this appeal and the interest of justice will be served by granting said Respondents an extension of time, Respondents therefore respectfully pray the Court for an order granting these Respondents an extension of fifteen (15) days to file their Initial Brief and Designation of Matter to be included in the Record on Appeal.

Accordingly, Respondents request the Court to enter an Order enlarging the time up to and including May 4, 2013, for the Respondents to submit their Initial Brief and Designation of Matter to be included in the Record on Appeal.

Respectfully submitted,



J. Jackson Thomas, Esquire
Emma Ruth Brittain, Esquire
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April 17, 2013

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ATTORNEYS FOR RESPONDENTS
CATHERINE L. MASON, JOSEPH E.
MASON, SR., KATHY ST. BLANCHARD
AND MASON HOLDING COMPANY,
INC.

THE STATE OF SOUTH CAROLINA
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Joseph E. Mason, Jr.,Appellant

v.

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Company, Inc., and Irwin Levine Respondents

PROOF OF SERVICE

I certify that I have served the Respondents' Catherine L. Mason, Joseph E. Mason, Sr., Kathy St. Blanchard, and Mason Holding Company, Inc.'s Motion for Extension of Time to File the Initial Brief and Designation of Matter on the Appellant, by depositing a copy of it in the United States Mail, postage prepaid, on April 17, 2013, addressed to its attorney of record, Robert Y. Knowlton, Esquire, and the Co-Respondent as follows:

Robert Y. Knowlton, Esquire
Haynsworth Sinkler Boyd, P.A.
Post Office Box 11889
Columbia, South Carolina 29211

Mr. Irwin Levine
203777 Soneto Drive
Boca Raton, Florida 33433

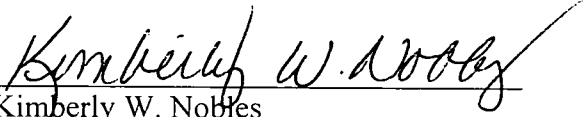
PROOF OF SERVICE

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CO Court of Appeals

Mr. Irwin Levine
Levine & Associates
5769 N. Andrews Way
Fort Lauderdale, Florida 33309

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211


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April 17, 2013

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*CERTIFIED EMPLOYMENT
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April 17, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Joseph E. Mason, Jr. v. Catherine L. Mason, Joseph E. Mason, Sr.,
Kathy St. Blanchard, Mason Holding Company, Inc., and Irwin Levine
Case No. 2008-CP-26-6169

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Respondents Catherine L. Mason, Joseph E. Mason, Sr., Kathy St. Blanchard and Mason Holding Company, Inc.'s Motion for Extension of Time to File Respondents' Initial Brief and Designation of Matter in the above-referenced matter. The Respondent's Initial Brief is due April 19, 2013, and we respectfully request a fifteen day extension of time in which to file the Respondents' Initial Brief and Designation of Matter, making it due May 4, 2013. Counsel for the Appellant has graciously consented to this request.

We are enclosing a check for the filing fee in the amount of \$25.00. Please return a stamped copy of the Motion to our office in the enclosed self-addressed envelope. In the meantime, we respectfully request that the current deadline for filing the Brief be stayed pending resolution of this request.

Sincerely yours,

THOMAS & BRITTAIN, P.A.



Emma Ruth Brittain

ERB/kwn
Enclosures

cc: Robert Y. Knowlton, Esquire
Mr. Irwin Levine
Mr. and Mrs. Joseph E. Mason, Sr.
Ms. Kathy St. Blanchard

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SC Court of Appeals