

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

68187

APPEAL FORM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson, Jr.

Case No. 2012-CP-10-2802

Discover Bank,.....Appellant,

v.

Jay Brown a/k/a John G. Brown, III,.....Respondent.

NOTICE OF MOTION AND MOTION  
FOR AN EXTENSION OF TIME TO  
FILE INITIAL BRIEF OF THE  
RESPONDENT

RECEIVED

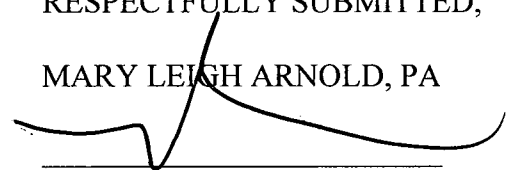
APR 25 2013

The Respondent, Jay Brown a/k/a John G. Brown, III, by and through his undersigned counsel, hereby moves before this Court for an order granting Respondent a stay of appeal extension, or until June 25, 2013, in which to file the Respondent's Initial Brief.

SC Court of Appeals

RESPECTFULLY SUBMITTED,

MARY LEIGH ARNOLD, PA



Mary Leigh Arnold  
749 Johnnie Dodds Blvd., Suite B  
Mt. Pleasant, SC 29464  
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[sammie@maryarnoldlaw.com](mailto:sammie@maryarnoldlaw.com)  
*Attorney for Respondent*

April 23, 2013  
Mt. Pleasant, SC

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PROOF OF SERVICE

I certify that on this 22 day of April, 2013, I have served the Respondents Notice of Motion and Motion for an Extension of Time to File the Initial Brief of the Respondent on the Appellant Discover Bank, by depositing a copy of the same in the United States Mail postage pre-paid, addressed as follows:

Trevor M. Hughey  
SMITH DEBNAM NARRON DRAKE  
SAINTINGS & MYERS, LLP  
P.O. Box 26268  
Raleigh, NC 27611  
*Attorney for Appellant*

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RESPECTFULLY SUBMITTED,

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*Attorney for Respondent*

**A** MARY LEIGH ARNOLD P.A.

Attorney and Counselor at Law

April 23, 2013

The Honorable Jenny Abbott Kitchings  
Clerk of Court, SC Court of Appeals  
1015 Sumter Street  
P.O. Box 11629 (29211)  
Columbia, SC 29201

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**RE.: Discover Bank v. Jay Brown**  
**App. Case No.: 2012-21-3674**

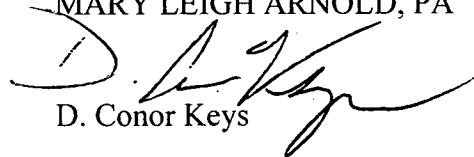
Dear Ms. Kitchings:

Please find enclosed, in regards to the above referenced matter, the following:

1. An Original Notice of Motion and Motion for an Extension of Time to File the Initial Brief of the Respondent;
2. Six (6) copies of the above referenced motion;
3. A Proof of Service of the Motion;
4. A corresponding check for the motion.

I kindly request that you file the same with the Court.

MARY LEIGH ARNOLD, PA

  
D. Conor Keys

Enclosures:  
(as stated)  
CC:  
Trevor M Hughey

**RECEIVED**  
APR 25 2013  
**SC Court of Appeals**