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*LICENSED IN SC + GA
+SC CIRCUIT COURT MEDIATOR

February 2, 2022

Via Electronic and U.S. Mail

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED
FEB 04 2022
SC Court of Appeals

**RE: Otha Delaney v. First Financial of Charleston, Inc.
Appellate Case No. 2021-001443**

Dear Ms. Kitchings:

I write to request a 10-day extension to file and serve Respondent’s Memorandum regarding appealability in the referenced matter.

Yesterday, out of an abundance of caution, my office contacted the Clerk’s office to ensure that a Memorandum regarding appealability was not due from Respondent, since the December 17, 2021 letter requesting Memorandum was only addressed to Appellant’s counsel. During yesterday’s phone call, it was explained that the letter should have been addressed to both Appellant and Respondent’s counsel, and further, that it was an oversight that the letter was only addressed to Appellant’s counsel. We are happy to prepare a Memorandum regarding appealability but will need a little more time to do so as we only learned that the Court would like said Memorandum from Respondent yesterday.

Accordingly, I write to request an extension. It is my understanding that Appellant filed its Memorandum on January 24, 2022, making Respondent’s Memorandum due February 3, 2022. I am out of the office on vacation this week and return to the office on February 7, 2022. I would request an extension until Monday, February 14, 2022.

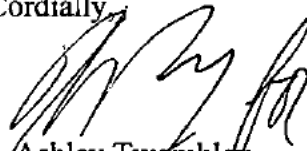
Pursuant to paragraph (c) of the Supreme Court’s Order dated August 25, 2021 (“Methods of Electronic filing and Service Under Rule 252 of the South Carolina Appellate Rules”) a check for the filing fee is being forwarded via U.S. mail. If you require a formal motion, please let us know and one will be submitted immediately.

We have consulted with Appellant’s counsel, Russell G. Hines, Esquire, copied here, and understand that Appellant’s Counsel is not opposed to the request.

Thank you for your consideration of this request. If you have any questions, please do not hesitate to contact me.

With kindest personal regards, I remain,

Cordially,

A handwritten signature in black ink, appearing to read 'J. Ashley Twombly', written in a cursive style.

J. Ashley Twombly

cc: Stephen L. Brown, Esquire (sbrown@ycrlaw.com)
Russell G. Hines, Esquire (rhines@ycrlaw.com)
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