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Feb 28 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM SUMTER COUNTY

Court of Common Pleas

George M. McFaddin, Jr. Circuit Court Judge

Case No. 2020-CP-43-01863, Circuit Court
Appeals Court Docket No.: 2021-001368

New Life Apostolic Church, Inc., and Ricky FinkleaAppellants,

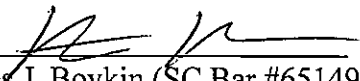
v.

Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr.,
Lang Priester, David S. Johnson, Sr., and Paul C. Johnson.....Respondents.

MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' INITIAL BRIEF

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Appellants New Life Apostolic Church, Inc., and Ricky Finklea (collectively "Appellants"), by and through their undersigned counsel, hereby move the Court for a thirty (30) day extension of time until April 11, 2022, to file and serve Appellants' Initial Brief in this case. The current deadline to file the brief is March 11, 2022. The undersigned affirms that this Motion is not made for purposes of delay; but rather, to provide counsel with sufficient time to prepare an initial brief. Several matters have arisen relating to the case and the property involved, including initiation of condemnation proceedings by the South Carolina Department of Transportation. The matters, along with other time sensitive issues for Appellants' counsel have necessitated this request for extension.

This is the first request for an extension submitted. Therefore, counsel for Appellants New Life Apostolic Church, Inc., and Ricky Finklea respectfully requests, for good and sufficient cause, that the time period for filing Appellants' Initial Brief in the above captioned matter be extended to April 11, 2022.

By: 
Charles J. Boykin (SC Bar #65149)
Kenneth A. Davis (SC Bar #66416)
Peter E. Keup (SC Bar #78383)

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Attorneys for New Life Apostolic Church, Inc.,
and Ricky Finklea

February 28, 2022
Columbia, South Carolina

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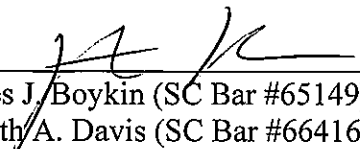
PROOF OF SERVICE

I certify that I have served the **MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' INITIAL BRIEF** on the counsel of record listed below, by depositing a copy of it in the United States Mail, postage prepaid, on February 28, 2022, addressed to:

James Y. Becker, Esq.
Costa M. Pleicones, Esq.
Roald T. Scott, Esq.
Haynesworth Sinkler Boyd, PA
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SC Court of Appeals

February 28, 2022

VIA ELECTRONIC MAIL AND U.S. MAIL

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

Re: New Life Apostolic Church, Inc., and Ricky Finklea v. Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr., Lang Priester, David S. Johnson, Sr., and Paul C. Johnson
Appeals Court Docket No.: 2021-001368

Dear Ms. Kitchings:

Enclosed for filing please find a Motion for Extension of Time to File Appellants' Initial Brief. Also enclosed please find the motion filing fee.

Thank you for your assistance in this matter.

Sincerely,



Peter E. Keup

/aeg

Enclosures

cc: James Y. Becker, Esq (w/encls.)
Costa M. Pleicones, Esq. (w/encls.)
Ronald T. Scott, Esq. (w/encls.)
G. Murrell Smith, Jr., Esq. (w/encls.)
Charles J. Boykin, Esq. (w/o encls.)
Kenneth A. Davis, Esq. (w/o encls.)