

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
JUL 24 2013
SC Court of Appeals

APPEAL FROM AIKEN COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Presiding Judge

Case No. 2013-000826

William R. Ferrara Plaintiff/Appellant,

v.

Michael E. Hunt, Sheriff of Aiken County;
and Charles Cain in his individual capacity as Deputy Sheriff Defendants/Respondents.

MOTION FOR EXTENSION OF TIME

The undersigned, as counsel for the Appellant hereby moves for a Thirty (30) day extension of time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. This motion is based on counsel's present work load. This extension request is not intended for purposes of delay, but rather to ensure that Appellant's Brief is properly researched and prepared. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend Appellant's deadline for filing their Initial Brief and Designation of Matter to be Included in the Record on Appeal to August 26, 2013.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of the Initial Brief and Designation of Matter to be Included in the Record on Appeal to August 26, 2013.



S. Jahue Moore, Esquire
John C. Bradley, Jr., Esquire
Moore, Taylor & Thomas, P.A.
Post Office Box 5709
West Columbia, South Carolina 29171
(803) 796-9160

ATTORNEYS FOR APPELLANT

July 23, 2013

Other Counsel of Record:

Matthew B. Rosbrugh, Esquire
MBR Law, LLC
P.O. Box 292290
Columbia, SC 29229

Robert D. Garfield, Esquire
Davidson & Lindemann, PA
P.O. Box 8568
Columbia, SC 29202-8568

ATTORNEYS FOR THE RESPONDENTS

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM AIKEN COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Presiding Judge

Case No. 2009-CP-02-1529

RECEIVED
JUL 24 2013
SC Court of Appeals

William R. Ferrara Plaintiff/Appellant,

v.


Michael E. Hunt, Sheriff of Aiken County;
and Charles Cain in his individual capacity as Deputy Sheriff Defendants/Respondents.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time, by mail, upon all counsel of record on July 24, 2013.

Matthew B. Rosbrugh, Esquire
MBR Law, LLC
P.O. Box 292290
Columbia, SC 29229

Robert D. Garfield, Esquire
Davidson & Lindemann, PA
P. O. Box 8568
Columbia, SC 29202-8568



S. Jahue Moore, Esquire
John C. Bradley, Jr. Esquire
Moore, Taylor, & Thomas, PA
Post Office Box 5709
West Columbia, SC 29169
(803)-796-9160

ATTORNEYS FOR APPELLANT