

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

69563

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

RECEIVED

AUG 26 2013

SC Court of Appeals

Appellate Case No. 2013-000022
Case No. 2011-CP-36-00588

Danny Abrams and Frances Abrams,Appellants,

v.

City of Newberry,Defendants,

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANTS' INITIAL BRIEF AND
DESIGNATION OF MATTER**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT
APPEALS:

Appellants respectfully move this Court for an Order granting them an extension of time in which to file and serve their Initial Brief and Designation of Matter.

Counsel for Appellants have been conscientious in their efforts to prepare Appellants' Initial Brief and Designation of Matter; however,

close 8/26
extend 9/25
I St
W/consent

because of the complexity of many of the legal issues attendant in this case, counsel projects they will require additional time to complete their Initial Brief and Designation of Matter. The current deadline is August 26, 2013. Appellants request a thirty (30) day extension, which would place the new deadline at September 25, 2013.

Counsel for Appellants have consulted with counsel for Respondent and obtained consent to this motion.

Appellants greatly appreciate the Court's time, attention, and assistance with regard to this request.

Respectfully submitted,
COLLINS & LACY, P.C.



By:

CHRISTIAN STEGMAIER
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ATTORNEYS FOR APPELLANTS

August 26, 2013
Columbia, South Carolina

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PROOF OF SERVICE

I hereby certify that I served the Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on August 26, 2013, addressed to the following:

COUNSEL SERVED:

David L. Morrison, Esquire
Morrison Law Firm
7453 Irmo Drive, Suite B
Columbia, SC 29212

Respectfully submitted,
COLLINS & LACY, P.C.



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ATTORNEYS FOR APPELLANTS

**PROOF OF SERVICE – MOTION
FOR EXTENSION OF TIME TO
FILE APPELLANTS’ INITIAL
BRIEF AND DESIGNATION OF
MATTER**

August 26, 2013
Columbia, South Carolina



Christian Stegmaier | Direct Dial: 803.255.0454 | E-Mail: cstegmaier@collinsandlacy.com

August 26, 2013

VIA HAND-DELIVERY

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

RE: *Danny Abrams and Frances Abrams v. City of Newberry*
Appellate Case No.: 2013-000022
C/A No.: 2009-CP-36-222
C&L File No.: 1325-100

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter in the above-referenced matter. I am also enclosing herewith a check in the amount of \$25.00 for the required filing fee.

By copy of this letter, I am serving a copy of same upon counsel for Respondent.

Thank you for your time and attention. Should you have any questions, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read "C Stegmaier".

Christian Stegmaier

CBS:lcc

Enclosures

cc: David L. Morrison, Esquire

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AUG 26 2013

SC Court of Appeals