

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. 2013-000826

RECEIVED
AUG 21 2013

SC Court of Appeals
6950

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 fifteen (15) 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 and the number of documents to review to determine what documents should be included in the Record on Appeal. 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 September 10, 2013. Counsel for the Respondent Cain has been consulted and consent to this Request.

2nd
8-26-13
(15 days)
9/10/13

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 September 10, 2013.



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August 21, 2013

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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

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 August 21, 2013.

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

RE: William Ferrara vs. Michael E. Hunt
C/A #2009-CP-02-1529
Ct. Appeals Case No. 2013-000826

Dear Ms. Kitchings:

Due to the other work obligations, including the need to travel to Aiken and review the voluminous lower court file, the undersigned as Attorneys for the Appellant William Ferrara respectfully request and move for an Extension of Time, requesting a fifteen (15) day extension of time to file its Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal in the above-referenced action. Enclosed please find an original and seven (7) copies of our Motion for Extension of Time. Please file the original and return the filed copies to my courier. This is the second request for an extension of time. Counsel for Respondents consent to this request. According to our calculations our Initial Brief and Designation are currently due on August 26, 2013. With the additional fifteen (15) day extension, these will be due on September 10, 2013.

Our check in the amount of \$25.00 is enclosed as the required filing fee. Thank you in advance for your assistance in this matter.

With kind regards, I remain

Respectfully Yours,


John C. Bradley, Jr.

JCBjr:dc
Enclosures
cc w/encl.: Matthew B. Rosbrugh, Esquire
Robert D. Garfield, Esquire