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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 29 2013

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee. Lee, Circuit Court Judge

Appellate Case No. 2013-001102
Case No. 2011-CP-40-04883R

Raymond Armstrong Appellant,

v.

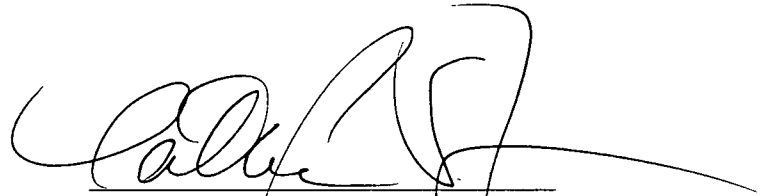
Jacqueline Berry and Samuel J. Thompson. Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
AND SERVE INITIAL BRIEF,
DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL AND PROOF OF SERVICE**

Respondent, Samuel J. Thompson, hereby moves for an extension of time of thirty (30) days for filing his initial brief, the designation of matter to be included in the record on appeal and proof of service thereof on the appellant in the above-referenced case. To date, respondent has not requested an extension of time. The appellant filed his initial brief and designation of matter on October 1, 2013; therefore, the initial brief would be due on October 31, 2013. The respondent respectfully requests an extension of time until November 30, 2013. This extension of time is necessitated due to the schedule of the attorney for the respondent and the complexity of the issues to be addressed in the initial brief.

Respondent has consulted with appellant's attorney who has consented to this request for an extension.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Catharine Griffin', written over a horizontal line.

Catharine Garbee Griffin
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400 (29204)
Post Office Box 8057
Columbia, South Carolina 29202
(803) 799-9091
Attorneys for Respondent

October 29, 2013

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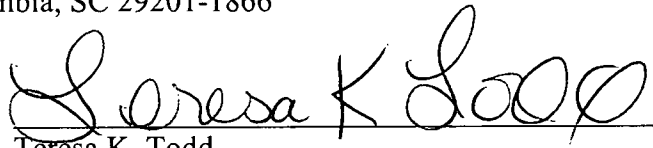
v.

Jacqueline Berry and Samuel J. Thompson. Respondent.

CERTIFICATE OF SERVICE

I, Teresa K. Todd, Legal Assistant to Catharine Garbee Griffin, an employee of Baker, Ravenel & Bender, L.L.P., hereby certify that I have, on the date indicated below, served counsel below with Defendant Thompson's Motion for Extension of Time to File and Serve Initial Brief, Designation of Matter to Be Included in The Record on Appeal and Proof of Service by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following address:

Shannon L. Felder, Esquire
The Solomon Law Group
1519 Richland Street
PO Box 1866
Columbia, SC 29201-1866


Teresa K. Todd

October 29, 2013



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

D. CRAVENS RAVENEL October 29, 2013

¹JAY BENDER

S. MARKEY STUBBS

CATHARINE GARBEE GRIFFIN

²WILLIAM PEARCE DAVIS

BRADLEY L. LANFORD

SAMUEL M. MOKEBA

³SUSAN DRAKE DUBOSE

MARIEL D. NORTON

¹PATRICK D. QUINN

WILSON P. DAVIS

ALINA DUDALI

VIA HAND DELIVERY BY COURIER

The Honorable V. Claire Allen
Deputy Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

CHARLES E. BAKER
(1935-2010)

Re: Raymond Armstrong v. Jacqueline Berry and Samuel J. Thompson
Claim No. 36-917-07
C. A. No. 2013-001102
Our File No. 8852.200

¹OF COUNSEL
²ALSO ADMITTED IN GEORGIA
³ALSO ADMITTED IN VIRGINIA

Dear Ms. Allen:

Enclosed herein please find the original and one copy of a motion for extension of time to file and service initial brief, designation of matter to be included in record on appeal and proof of service. Could you please stamp the copy "filed" and return to me by courier. By copy of this letter to Ms. Felder, I am serving her with a copy of the same.

If you have any questions concerning this letter, please feel free to call me.

Yours truly,

Catharine Garbee Griffin

cgriffin@brblegal.com

CGG/akt

Enclosure

Cc: Shannon L. Felder, Esquire

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