

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

70286

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Stephanie McDonald, Circuit Court Judge

Case No. 2011-CP-10-4160

Anastasia Zimmerman,

Appellant,

v.

College of Charleston and Louis Burnett, named in his
individual capacity,

of whom,

College of Charleston is

Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S RETURN TO
RESPONDENT'S MOTION TO DISMISS APPEAL**

Nancy Bloodgood, Esq., SC Bar No. 6459
Lucy C. Sanders, Esq., SC Bar No. 78169
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Charleston, SC 29492
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lsanders@fosterfoster.com
Attorneys for the Appellant

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SC Court of Appeals

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

COMES NOW, the Appellant, Anastasia Zimmerman, pursuant to Rule 263 of the South Carolina Appellate Court Rules, and respectfully requests that this Court grant her a limited extension of time to respond to Respondent's Motion to Dismiss. Appellant has not yet received Respondent's Motion, but Counsel for the Respondent has indicated that the Motion was served yesterday, October 30, 2013. Specifically, Appellant requests that this Court extend Appellant's deadline to file her Return to the Motion until December 9, 2013.

This motion is based on the schedule of Appellant's Counsel and the need for additional time to negotiate a possible resolution of this case. Counsel for the Respondent consents to the relief requested in this Motion. Appellant also requests this Court hold Appellant's time to file her Return in abeyance until this Motion is considered and ruled upon.

Respectfully submitted,



Nancy Bloodgood, Esq., SC Bar No. 6459

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Attorneys for the Appellant

Charleston, South Carolina
October 31, 2013

Other Counsel of Record:

Cleveland Law, LLC
Bob J. Conley, Esquire
171 Church Street, Suite 310
Charleston, SC 29401
Attorneys for Respondent

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Anastasia Zimmerman,

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individual capacity,

of whom,

College of Charleston is

Respondent.

**PROOF OF SERVICE FOR APPELLANT'S MOTION FOR EXTENSION OF
TIME**

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Attorneys for the Appellant

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SC Court of Appeals

I hereby certify that on October 31, 2013 I served a copy of Appellant's Motion for Extension of Time to the following:

Cleveland Law, LLC
Bob J. Conley, Esquire
171 Church Street, Suite 310
Charleston, SC 29401
Attorneys for Respondent

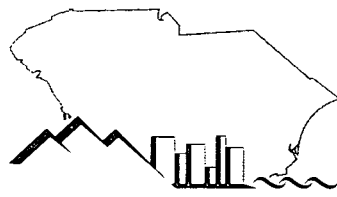
by placing a copy of said documents in the United States mail with sufficient postage thereon.



Nancy Bloodgood, Esquire

Charleston, South Carolina

Date: 10-31-13



FOSTER LAW FIRM, L.L.C.

Attorneys and Counselors at Law

NANCY BLOODGOOD
nbloodgood@fosterfoster.com
REPLY TO CHARLESTON

PAUL J. FOSTER, JR., 1928-1999

October 31, 2013

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

RE: *Anastasia Zimmerman v. College of Charleston and Louis Burnett, named in his individual capacity*
Appeal Case No.: 2013-001958
Case No.: 2011-CP-10-4160
Our File No.: 9641.0000

Dear Ms. Kitchings,

Enclosed please find for filing the original and seven copies of the Motion for Extension of Time to File Appellant's Return to Respondent's Motion to Dismiss Appeal and the corresponding Proof of Service. Also enclosed is our Firm's check in the amount of \$25.00 representing the filing fee for the same. Please return a filed-stamped copy to me in the enclosed self-addressed stamped envelope.

By copy of this letter to opposing counsel, I am serving a copy of the same.

Thank you for your assistance in this matter.

With kindest regards, I am

Sincerely,

Nancy Bloodgood

NB/alk
Enclosures

cc: Bob J. Conley, Esquire, Cleveland Law, LLC

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SC Court of Appeals

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