

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

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

Danny Abrams and Frances Abrams ..... Appellants,

v.

City of Newberry ..... Respondent.

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**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF AND  
RESPONSE TO DESIGNATION OF MATTER**

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

Respondent respectfully moves this Court for an Order granting them an extension of thirty (30) days until January 2, 2014, in order to file Respondent's Reply Brief and Designation of Matter in this action.

Counsel for Respondent represents to this Court that despite diligent efforts to prepare the Initial Brief, deadlines in other matters and the holidays prevented counsel from being able to meet the deadline. This is the first request for an extension.

Respondent represents to this Court that counsel for Respondent consulted with counsel

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**SC Court of Appeals**

for Appellants and that counsel for Appellants consents.

MORRISON LAW FIRM, LLC

By: 

David L. Morrison

Kassi B. Sandifer

7453 Irmo Drive, Suite B

Columbia, South Carolina 29212

Phone: (803) 661-6285

Fax: (803) 661-6289

E-mail: david@dmorrison-law.com

E-mail: kassi@dmorrison-law.com

ATTORNEYS FOR THE RESPONDENT

Columbia, South Carolina

December 2, 2013

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

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

Danny Abrams and Frances Abrams ..... Appellants,

v.

City of Newberry ..... Respondent.

**CERTIFICATE OF SERVICE**

The undersigned employee of Morrison Law Firm, LLC, attorney for the Respondent, City of Newberry, does hereby certify that service of the Motion for Extension of Time to File Reply Brief and Response to Designation of Matter in the above-captioned action was made upon all counsel of record by placing same in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 2<sup>nd</sup> day of December, 2013, addressed as follows:

Christian Stegmaier, Esquire  
Post Office Box 12487  
Columbia, South Carolina 29211



Callie M. Morrison

Columbia, South Carolina

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SC Court of Appeals

**Morrison Law Firm, LLC**

7453 Irmo Drive, Suite B  
Columbia, South Carolina 29212  
Phone: (803) 661-6285  
Fax: (803) 661-6289  
[david@dmorrison-law.com](mailto:david@dmorrison-law.com)  
[kassi@dmorrison-law.com](mailto:kassi@dmorrison-law.com)

David L. Morrison\*  
Kassi B. Sandifer

\*Licensed in SC & NC  
\*Certified Mediator

December 2, 2013

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

RE: Danny Abrams and Frances Abrams v. City of Newberry  
C/A #: 09-CP-36-222 (new # 11-CP-36-00588)  
Court of Appeals #: 2013-000022  
Date of Loss: 3/5/08  
Claim #: 690001C04738  
Our File: 210.0188

Dear Clerk Kitchings:

Enclosed is the Respondent's Motion for Extension of Time to File Reply Brief and Response to Designation of Matter in the above-referenced case. By copy of this letter, attorney for Appellants is being served with a copy of same.

Very truly yours,

MORRISON LAW FIRM, LLC



David L. Morrison

DLM/cmm

Enclosure

cc: Christian Stegmaier, Esquire

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DEC 03 2013

**SC Court of Appeals**