

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

Case No. 2012-CP-20-099  
Appellate Case No. 2013-001257

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DEC 02 2013

SC Court of Appeals

David Michael Hollis.....Appellant,

v.

Fairfield County, Philip Hinely, Davis Anderson and David Brown.....Respondents.

**MOTION FOR EXTENSION OF TIME TO REPLY TO  
RESPONDENTS' INITIAL BRIEF & DESIGNATION OF MATTER**

The undersigned counsel for the Appellant David Michael Hollis respectfully requests an extension of time to file his Initial Reply Brief and/or Designation of Matter in the above-captioned appeal. Appellant respectfully requests an extension of ten (10) days with a new due date of December 12, 2013.

This motion is based on the following grounds:

1. The undersigned Counsel for the Appellant never received a copy of the Respondent's Initial Brief and Designation of Matter on or around the deadline of November 18, 2013.

2. The undersigned counsel for the Appellant spoke with the Respondent's counsel this past week after realizing that we had not received a copy of the Respondent's Initial Brief

and Designation of Matter which had been due on November 18, 2013. On Wednesday, November 27, 2013, the undersigned received by email a copy of Respondent's Initial Brief and Designation of Matter.

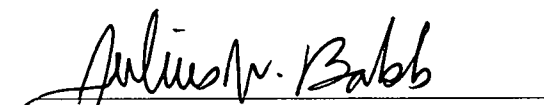
3. If Appellant's counsel had received the Initial Brief and Designation of Matter on the required date of November 18, 2013, the Appellant's due date of his Reply Brief & Supplemental Designation of Matter would have been due on November 28, 2013, which coincided with the Thanksgiving Holidays. Taking that into consideration, the Appellant's Reply Brief and Designation of Matter are now due today, December 2, 2013.

4. The undersigned is not able to adequately respond to Respondent's Initial Brief under the current deadline and in the interests of justice, respectfully requests that this Honorable Court grant this extension of time to reply to Respondents' Initial Brief.

5. The Respondents' counsel has been consulted and has kindly consented to the requested extension.

WHEREFORE, the Appellant's counsel respectfully requests that he be allowed additional time, through and including December 12, 2013, in which to file and serve his Initial Reply Brief and Supplemental Designation of Matter to be Included in the Record on Appeal.

J. Lewis Cromer & Associates, L.L.C.

  
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Attorneys for Appellant

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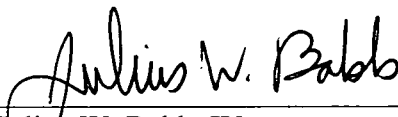
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**PROOF OF SERVICE**

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I certify that I, undersigned employee of J. Lewis Cromer & Associates, L.L.C., caused to be served the Appellant's Motion for Extension of Time to Reply to Respondents' Initial Brief and Designation of Matter on Fairfield County, Philip Hinely, Davis Anderson and David Brown by depositing a copy of it in the United States Mail, postage prepaid, on December 2, 2013, addressed to their attorney of record, Derwood L. Aydlette, III, with the law firm of Gignilliat, Savitz & Bettis, L.L.P., 900 Elmwood Avenue, Suite 100, Columbia, South Carolina 29201.

December 2, 2013

  
\_\_\_\_\_  
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