

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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76637

APPEAL FROM DILLON COUNTY  
Alison Renee Lee, Circuit Court Judge

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Case Nos. 2008-CP-17-0376  
2008-CP-17-0377

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Claude W. Graham, ..... Respondent-Appellant,

v.

Town of Latta, South Carolina, ..... Appellant-Respondent.

AND

Vickie B. Graham, ..... Respondent-Appellant,

v.

Town of Latta, South Carolina, ..... Appellant-Respondent.

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**MOTION FOR EXTENSION  
TO FILE INITIAL BRIEFS**

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**RECEIVED**  
DEC 11 2013  
SC Court of Appeals

The Appellant-Respondent Town of Latta respectfully moves this Court for an extension of time until December 27, 2013, by which to file and serve its Initial Appellant's Brief, Initial Respondent's Brief and Designations of Matter to be Included in the Record on Appeal.

The Appellant-Respondent Town of Latta's motion is based on the following grounds:

1. The Initial Appellant's Brief and Initial Respondent's Brief of Appellant-Respondent Town of Latta are currently due to be filed and served on December 12, 2013.

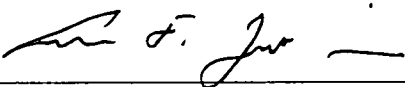
2. No prior extension has been requested for the Initial Respondent's Brief. The Initial Appellant's Brief filed by the Grahsm was served on November 12, 2013.

3. The undersigned counsel for the Appellant-Respondent Town of Latta requires additional time to prepare the Initial Appellant's Brief and Initial Respondent's Brief because of other obligations and deadlines including two other briefs due this week, an additional brief due in the Court of Appeals on December 16, 2013, a Federal Court summary judgment motion due on December 16, 2013, and a trial scheduled for the week of December 16, 2013 in the Richland County Court of Common Pleas.

4. Counsel for the Respondents-Appellants, Claude W. Graham and Vickie B. Graham, has consented to the requested extension which is documented by an exchange of emails. (See attached).

WHEREFORE, the Appellant-Respondent Town of Latta respectfully requests that it be allowed until December 27, 2013, by which to file and serve its Initial Appellant's Brief, Initial Respondent's Brief and Designations of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY:  \_\_\_\_\_

ANDREW F. LINDEMANN  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Appellant-Respondent  
Town of Latta*

Columbia, South Carolina

December 11, 2013

## Andrew Lindemann

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**From:** Reynolds Williams <Reynolds@willcoxlaw.com>  
**Sent:** Wednesday, December 11, 2013 2:18 PM  
**To:** Andrew Lindemann  
**Subject:** Re: Grham v. Town of Latta

Of course

Reynolds Williams

On Dec 11, 2013, at 1:13 PM, "Andrew Lindemann" <[alindemann@DML-LAW.com](mailto:alindemann@DML-LAW.com)> wrote:

Reynolds:

I need a favor because I am in a bind. I have two other briefs due this week and now a trial to get read for next week. I will need to ask for some additional time for the brief in this case from the Court of Appeals. Would you kindly consent to an additional 15 days – until December 27<sup>th</sup> – for me to file both the Initial Appellants' Brief and the Initial Respondent's Brief (in response to your appeal) by that deadline?

I would definitely appreciate the courtesy and would of course return the favor as needed.

Thanks.

Andrew

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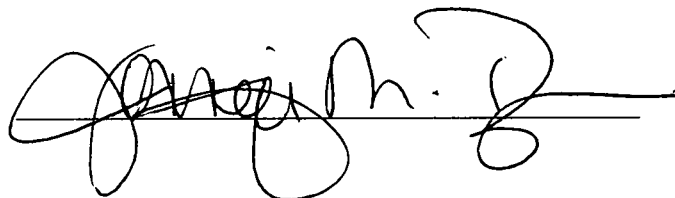
Town of Latta, South Carolina, ..... Appellant-Respondent.

**CERTIFICATE OF SERVICE**

The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Appellant-Respondent, Town of Latta, does hereby certify that service of the **Motion**

**for Extension to File Initial Briefs** in the above-captioned matter was made upon all counsel of record by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 11th day of December 2013:

Reynolds Williams, Esquire  
Willcox, Buyck & Williams  
Post Office Box 1909  
Florence, South Carolina 29503-1909

A handwritten signature in black ink, appearing to read "Reynolds Williams", written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

# DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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\*Also Admitted In North Carolina  
†Certified Mediator

December 11, 2013

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

## **Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Edgar Brown Building  
1205 Pendleton Street  
Columbia, South Carolina 29201

RE: Claude W. Graham v. Town of Latta, South Carolina  
Vickie B. Graham v. Town of Latta, South Carolina  
Appellate Case Number: 2013-000752  
Civil Action Numbers: 2008-CP-17-0376 and 2008-CP-17-0377  
Claim Number: 690001C05341  
Our File Number: 321.7974

Dear Ms. Kitchings:

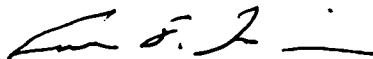
Please find enclosed for filing the original and seven copies of the **Motion for Extension to File Initial Briefs** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier. I have also enclosed my firm's \$25.00 check for the filing fee.

By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
December 11, 2013  
Page Two

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cc: (w/ Enclosure)

Reynolds Williams, Esquire  
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