

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

G. Wells Dickson, Special Referee

Case No: 2010-CP-45-434

RECEIVED

MAY 03 2012

SC Court of Appeals

Town of Kingstree, a Body Corporate and Politic, Respondent

v.

Gary W. Chapman, Jr., Terilyn J. McClary, Waccamaw
Housing, Inc., Lydia F. Duke, Alice H. Kellahan, and
South Carolina Department of Transportation, Defendants

of whom Lydia F. Duke and Alice H. Kellahan are Appellants

MOTION FOR EXTENSION OF TIME TO FILE
INITIAL REPLY BRIEF OF APPELLANTS

Appellants, Lydia F. Duke and Alice H. Kellahan, pursuant to Rule 224, SCACR, hereby moves for a 20-day extension, in which to file the Initial Reply Brief of the Appellants. This request for an extension is made on the grounds that the undersigned has other business which has prevented the undersigned from completing the Initial Reply Brief of the Appellants. The Counsel for the Respondent does not object to the extension as evidenced by the attached consent.

Counsel for the Appellants respectfully requests that the time limits on the appeal be stayed pending this motion.

An extension of 20 days will work no prejudice to any party to this action and is in the interest of justice.

Respectfully submitted.



Larry G. Reddeck
NETTLES, TURBEVILLE & REDDECK
Post Office Box 699
Lake City, SC 29560
(843) 374-8511 (phone)
(843) 374-3211 (fax)
Attorneys for the Appellants

April 30, 2012.

Lake City, SC

Other Counsel of Record:

M. Amanda Shuler, Esquire
P. O. Drawer 669
Kingtree, SC 29556
843-355-2000 (Phone)
843-355-2010 (Fax)
Attorney for Respondent

Ernest J. Jarrett, Esquire
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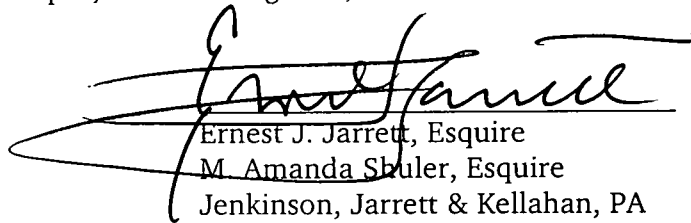
Gary W. Chapman, Jr., Terilyn J. McClary, Waccamaw
Housing, Inc., Lydia F. Duke, Alice H. Kellahan, and
South Carolina Department of Transportation, Defendants

of whom Lydia F. Duke and Alice H. Kellahan are Appellants

CONSENT TO MOTION FOR EXTENSION OF TIME TO FILE
INITIAL REPLY BRIEF OF APPELLANTS

The undersigned, as Attorneys for the Respondent Town of Kingstree, consent to the Motion of the Appellants for a twenty (20) day Extension of Time for the Appellants to File the Initial Reply Brief of Appellants in the above captioned matter.

Executed this 30 day of April, 2012 at Kingstree, S.C.



Ernest J. Jarrett, Esquire
M. Amanda Skuler, Esquire
Jenkinson, Jarrett & Kellahan, PA
P. O. Box 669
Kingstree, SC 29556
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Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

G. Wells Dickson, Special Referee

Case No: 2010-CP-45-434

Town of Kingtree, a Body Corporate and Politic, Respondent


v.

Gary W. Chapman, Jr., Terilyn J. McClary, Waccamaw
Housing, Inc., Lydia F. Duke, Alice H. Kellahan, and
South Carolina Department of Transportation, Defendants

of whom Lydia F. Duke and Alice H. Kellahan are Appellants

PROOF OF SERVICE

I certify that I have served the **MOTION FOR EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF OF APPELLANTS**, dated April 30, 2012 upon Respondent by depositing a copy of it in the United States Mail, postage prepaid on May 1, 2012, addressed to its attorney of record, **M. AMANDA SHULER, III, ESQUIRE AND ERNEST J. JARRETT, ESQUIRE, P. O. DRAWER 669, KINGSTREE, SC 29556.**



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May 1, 2012
VIA FAX AND REGULAR MAIL 803-734-1839

The Honorable Tanya A. Gee
Clerk, S.C. Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RE: Town of Kingstree v. Gary W. Chapman, Jr., et al.
Case No. 2010-CP-45-434

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SC Court of Appeals

Dear Ms. Gee:

Please find enclosed a Motion on behalf of the Appellants for an additional twenty (20) day extension to file the Appellants' Initial Reply Brief, together with the filing fee in the amount of \$25.00. Attached to our Motion is the consent of M. Amanda Shuler, Esquire and Jarrett J. Jarrett, Esquire, Attorneys for the Respondent, as well as our Proof of Service.

I have also enclosed seven copies of the foregoing.

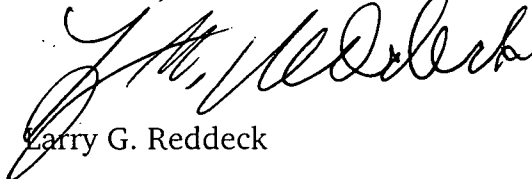
Please indicate the time of filing on one of the enclosed copies of the Motion and Proof of Service and return the same to me in the envelope provided.

Thank you for your consideration in this matter.

With kind regards, I am,

Very truly yours,

NETTLES, TURBEVILLE AND REDDECK



Larry G. Reddeck

LGR/lsk
Enclosures

cc: M. Amanda Shuler, Esquire - Via Fax and Regular Mail
Ernest J. Jarrett, Esquire - Via Fax and Regular Mail