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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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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.

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

v.

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

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**MOTION FOR EXTENSION  
TO FILE INITIAL RESPONDENT'S BRIEF**

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**RECEIVED**  
DEC 31 2013  
SC COURT OF APPEALS

The Appellant-Respondent Town of Latta respectfully moves this Court for an extension of time until January 3, 2014, by which to file and serve its Initial Respondent's Brief and Designation 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 Respondent's Brief of Appellant-Respondent Town of Latta IS currently due to be filed and served on December 27, 2013.

2. The undersigned counsel for the Appellant-Respondent Town of Latta requires additional time to complete the preparation of the Initial Respondent's Brief because of other obligations and deadlines. Specifically, the undersigned anticipated being able to complete the drafting of both the Initial Appellant's Brief and Initial Respondent's Brief by the current deadline but was unable to get the Initial Respondent's Brief completed. The undersigned was also delayed in preparing the brief because of a 50-page brief filed with the Fourth Circuit Court of Appeals on December 23, 2013. The undersigned also has two Federal Circuit briefs due on December 30, 2013. This workload has required this request for an additional seven days to complete the preparation of the Initial Respondent's Brief.

3. The undersigned counsel was unable to consult with opposing counsel prior to the filing of the motion, but based on prior experience, it is not anticipated that there will be an objection.

WHEREFORE, the Appellant-Respondent Town of Latta respectfully requests that it be allowed until January 3, 2014, by which to file and serve its Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY:   
\_\_\_\_\_  
ANDREW F. LINDEMANN  
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Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Appellant-Respondent  
Town of Latta*

Columbia, South Carolina

December 27, 2013

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In The Court of Appeals

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**CERTIFICATE OF SERVICE**

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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 Respondent's Brief** 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 27th day of December 2013:

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



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# DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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†Certified Mediator

December 27, 2013

Of Counsel  
Kenneth P. Woodington

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

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

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 Respondent's Brief** 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 27, 2013  
Page Two

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cc: (w/ Enclosure)

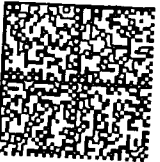
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The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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