

The State of South Carolina
In The Court of Appeals

Appeal from Spartanburg County
Hon. J. Derham Cole, Circuit Court Judge
2008-CP-42-0475

RECEIVED

DEC 23 2013

SC Court of Appeals

Case No. 2012-213499

John Doe, Appellant

v.

City of Duncan Respondent

Motion To Extend Time

Plaintiff/Appellant John Doe hereby moves the Court to extend the time for him to file the Record on Appeal.

The Record has been prepared and has been served on Respondent's Counsel, as the enclosed Proof of Service attests. The Record was due in November, but Appellant counsel's trial and appeal schedule caused him to miss that date. Counsel have a good working relationship, and Respondent's counsel communicated about the Record and counsel resolved all issues related to the Designations so as to avoid a Motion to Settle the Record. On December 16 all issues were resolved and the Record was prepared.

The Appellant requests that the Court accept out of time the service of the Record on Appeal.

Counsel's understanding is that Respondents do not oppose the motion.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregg Meyers". The signature is written in a cursive style with a large, stylized initial "G" and a long, sweeping tail.

Gregg Meyers
Jeff Anderson & Associates, P.A.
366 Jackson Street
St. Paul, MN 55101
651-227-9990, 297-6543 facsimile

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Proof of Service

I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

Motion to Extend Time

by causing a copy of the document to be placed in the United States mails, first-class postage pre-paid wrapper, properly addressed to:

William Foster
Miles Coleman
Nelson Mullins Riley & Scarbrough
PO Box 10084
Greenville SC 29603-0084

Done December 16, 2013



Gregg Meyers
Jeff Anderson & Associates, P.A.
366 Jackson Street
St. Paul, MN 29601
651-227-9990
Attorney for Appellant



JEFF ANDERSON & ASSOCIATES PA
REACHING ACROSS TIME FOR JUSTICE

December 16, 2013

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Appeal 2012-213499
Doe v. City of Duncan, Case No. 08-CP-42-0475
(Spartanburg County, Hon. J. Derham Cole)

Dear Ms. Kitchings:

Enclosed please find an original and six copies of a motion, a filing fee for that motion, a proof of service for the motion, and a proof of service for the Record on Appeal, which I have served today to Respondents' counsel pursuant to SCACR 210.

The motion seeks permission to file the Record out of time. Respondent's counsel and I worked to resolve without a motion the issues from the Designations, a process I began too late to meet the original time for filing. Having avoided a Motion to Settle the Record, I request the Court's allowance to serve the Record out of time for this appeal. My understanding is that Respondents do not oppose the motion.

Sincerely,

Gregg Meyers
gregg@andersonadvocates.com

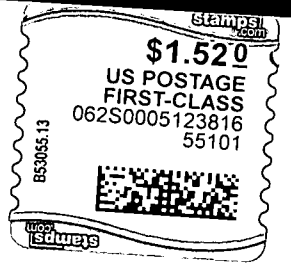
GM/tld
Enclosure: as stated

cc: Mr. Foster and Mr. Coleman, Attorneys for Respondents, with enclosures

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