

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

71128

APPEAL FROM AIKEN COUNTY  
In the Court of Common Pleas

RECEIVED

Doyet A. Early, III, Presiding Judge

JAN 30 2014

Case No. 2013-000826

SC Court of Appeals

William R. Ferrara ..... Appellant,

v.

Michael E. Hunt, Sheriff of Aiken County;  
and Charles Cain in his individual capacity as Deputy Sheriff ..... Defendants,

Of Whom Michael E. Hunt is the Respondent.

**MOTION FOR EXTENSION**

The undersigned, as counsel for the Appellant hereby moves for a thirty (30) day extension of time to file the Record on Appeal. This motion is based on counsel's present work load and work days lost due to inclement weather. This extension request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend Appellant's deadline for filing the record on appeal to March 5, 2014.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing the Record on Appeal to March 5, 2014.

\_\_\_\_\_  
S. Jahue Moore, Esquire  
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Moore Taylor Law Firm, PA  
Post Office Box 5709  
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(803)-796-9160

ATTORNEYS FOR APPELLANT

January 30, 2014

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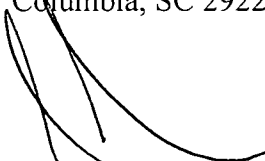
Of Whom Michael E. Hunt is the Respondent.

**PROOF OF SERVICE**

I certify that I have served the Motion for Extension, by mail, upon all counsel of record  
on January \_\_\_\_\_, 2014.

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Amber Cary Fulmer  
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Margaret "Meg" Hazel  
Billy C. Coleman (Ret.)

January 30, 2014

**VIA HAND DELIVERY**

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

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JAN 30 2014  
SC Court of Appeals

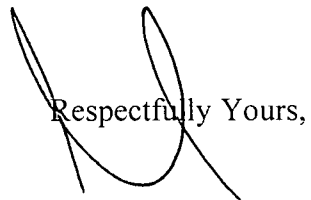
RE: William Ferrara vs. Michael E. Hunt, et al  
Appellate Case No. 2013-000826

Dear Ms. Kitchings:

Due to the other work obligations and the fact our office was closed for several days this week due to inclement weather, Attorneys for the Appellant William Ferrara respectfully request and move for and Extension of Time, requesting a thirty day extension of time to file the Record on Appeal in the above-referenced action. By our calculations, if the extension is granted, our time to file the Initial Brief will run through March 5, 2014.

Our check for \$25.00 is enclosed as the required motion fee. Thank you in advance for your assistance in this matter.

With kind regards, I remain

Respectfully Yours,  
  
John C. Bradley, Jr.

cc: Andrew F. Lindemann, Esquire  
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Meg Hazel, Esquire

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