

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 10 2014

SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Case No. 2013-CP-46-002580

Christopher A. WellbornAppellant,

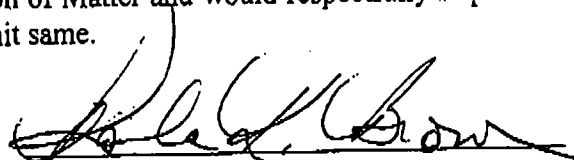
v.

City of Rock Hill.....Respondent.

MOTION FOR EXTENSION OF TIME/
MOTION TO FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER
OUTSIDE OF TIME, PURSUANT TO RULE 263(b), SCACR

Respondent moves for an extension of time of thirty (30) days to file Respondent's Initial Brief and Designation of Matter under Rule 234, SCACR.

Respondent received the Appellant's Initial Brief and Designation of Matter on January 30, 2014. Respondent's attorney bearing responsibility for preparation of the brief began the first of two court terms on February 3, 2014, entered a work-week shortened by the winter storm, followed by a work-week shortened by health-related concerns, returned to a one-week preparatory term, followed by the second of two jury-trial terms. Counsel for Respondent needs additional time in which to complete the Initial Brief and Designation of Matter and would respectfully request an extension of thirty (30) days to complete and submit same.



Paula Knox Brown
Attorney for Respondent
201 E. Main Street, Suite 300
Rock Hill, South Carolina 29730
803-329-5641

March 10, 2014
Rock Hill, SC

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SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Case No. 2013-CP-46-00258D

Christopher A. WellbornAppellant,


v.

City of Rock Hill.....Respondent.

CERTIFICATE OF SERVICE

I, Paula Knox Brown, hereby certify that I served the *Respondent's Motion for Extension of Time/Motion To File Respondent's Initial Brief and Designation of Matter Outside of Time, Pursuant to Rule 263(b), SCACR* on Counsel for Appellant, James Boyd, Esquire, by depositing a copy of the document in the United States mail, with sufficient postage affixed, on the 10th day of March, 2014. The envelope was addressed as follows:

James W. Boyd, Esquire
Post Office Box 36425
1544 Ebenezer Road
Rock Hill, SC 29732.



Paula Knox Brown
Attorney for Respondent
201 E. Main Street, Suite 300
Rock Hill, South Carolina 29730
803-329-5641

March 10, 2014
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The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Christopher Wellborn v. The City of Rock Hill
Case No. 2013-002580

Dear Ms. Kitchings:

Enclosed for filing with your office and for the Court's consideration are the Respondent's Motion for Extension of Time and Certificate of Service with six (7) copies of the Motion and one (1) copy of the Certificate. Please return one clocked copy per document to me in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving James Boyd, counsel for Appellant, with appropriate copies of the documents being filed.

Respectfully yours,

Paula Knox Brown
Attorney for Respondent

cc: James W. Boyd, Esquire

CITY OF ROCK HILL SOLICITOR'S OFFICE

201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730
OFFICE 803/329-5619 FACSIMILE 803/326-3865





ROCK HILL
SOUTH CAROLINA

FAX COVER SHEET

TO: Ms. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
@ 803-734-1839

cc: James Boyd, Esquire
@ 328-5747

FROM: Paula Knox Brown
City Solicitor

DATE: March 10, 2014

RE: Christopher Wellborn v. City of Rock Hill

Please see the attached letter and documents, which are being served on Respondent by mail and fax and being forwarded for filing to this Court by mail.



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CITY OF ROCK HILL SOLICITOR'S OFFICE

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