

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Case No. 2013-CP-46-03828

Christopher A. Wellborn .....Appellant,

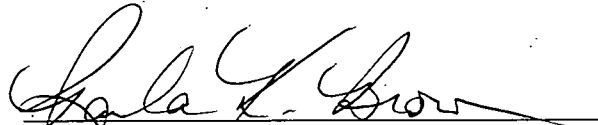
v.

City of Rock Hill.....Respondent.

MOTION FOR EXTENSION OF TIME IN WHICH  
TO FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER

Respondent moves for an extension of time of twenty-one (21) days to file Respondent's Initial Brief and Designation of Matter.

Respondent requested an extension of time on March 10, 2014. Said extension was granted until March 28, 2014. This motion results from several factors: undersigned, one of three prosecutors in the City Solicitor's office, has had increased court responsibilities due to co-counsel's intermittent absences from the office for military and other matters; significantly increased case- and docket-mandated clerical tasks to complete in preparation for jury trials, resulting from two of the office's three support (clerical) staff members who formerly handled such matters ending their employment with the solicitor's office without ability in the budget to replace them; medical appointments related to two significant, ongoing medical issues and surgery (then recovery) scheduled for next week; and the recent death and upcoming funeral of the undersigned's uncle.



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

RECEIVED

March 28, 2014  
Rock Hill, SC

MAR 31 2014

SC Court of Appeals

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In the Court of Appeals

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Court of Common Pleas

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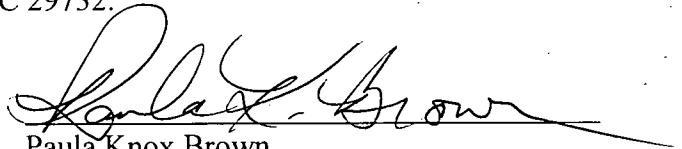
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CERTIFICATE OF SERVICE

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I, Paula Knox Brown, hereby certify that I served the *Respondent's Motion for Extension of Time in Which To File Respondent's Initial Brief and Designation of Matter* 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 28<sup>th</sup> 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 28, 2014  
Rock Hill, SC

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MAR 31 2014  
SC Court of Appeals



**ROCK HILL**  
SOUTH CAROLINA

March 28, 2014

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

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

Dear Ms. Kitchings:

Enclosed for filing with your office and for the Court's consideration is the Respondent's Motion for Extension of Time in Which To File Respondent's Initial Brief and Designation of Matter (original and seven [7] copies) with the Certificate of Service (one [1] copy). Please return one (1) clocked copy per document to me in the enclosed self-addressed, stamped envelope provided. 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 Boyd, Esquire

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**SC Court of Appeals**



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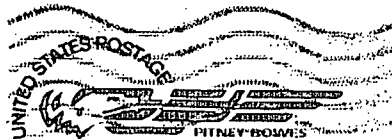
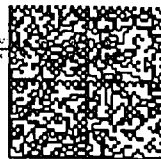


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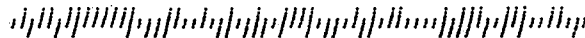
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