

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM DILLON COUNTY  
J. Michael Baxley, Circuit Court Judge

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Case Nos. 2008-CP-17-0376  
2008-CP-17-0377

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**RECEIVED**

MAY 06 2014

**SC Court of Appeals**

Claude W. Graham and Vickie B. Graham, ..... Appellants,

v.

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

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

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The Respondent Town of Latta respectfully moves this Court for an additional extension of time until May 6, 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 Respondent Town of Latta's motion is based on the following grounds:


1. The Initial Brief of Respondent is currently due to be filed and served on May 2, 2014.

2. The undersigned counsel for the Respondent believed that he would be able to meet the current deadline; however, the time needed for research and preparation of the Initial Brief was longer than anticipated. The undersigned counsel will be unable to complete the preparation of the brief by the current deadline and is requesting additional time through May 6, 2014. The delay has been the result of an extraordinary workload that the undersigned counsel currently has.

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

WHEREFORE, the Respondent Town of Latta respectfully requests that it be allowed until May 6, 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: 

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ANDREW F. LINDEMANN  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Respondent  
Town of Latta*

Columbia, South Carolina

May 2, 2014

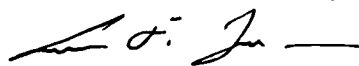
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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Respondent Town of Latta, does hereby certify that service of the **Motion for Extension to File Initial Brief** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 2nd day of May 2014:

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



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MAY 06 2014

**SC Court of Appeals**

# DAVIDSON & LINDEMANN, P.A.

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†Certified Mediator

May 2, 2014

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 and Vickie B. Graham v. Town of Latta, South Carolina  
Appellate Case Number: 2014-000208  
Civil Action Numbers: 2008-CP-17-0376 and 2008-CP-17-0377  
Claim Number: 690001C05341  
Our File Number: 321.7974

Dear Ms. Kitchings:

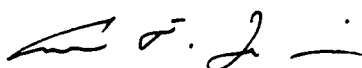
Please find enclosed for filing the original and seven copies of the **Motion for Extension to File Initial Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier. I will be forwarding under separate cover a \$25.00 check for the filing 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

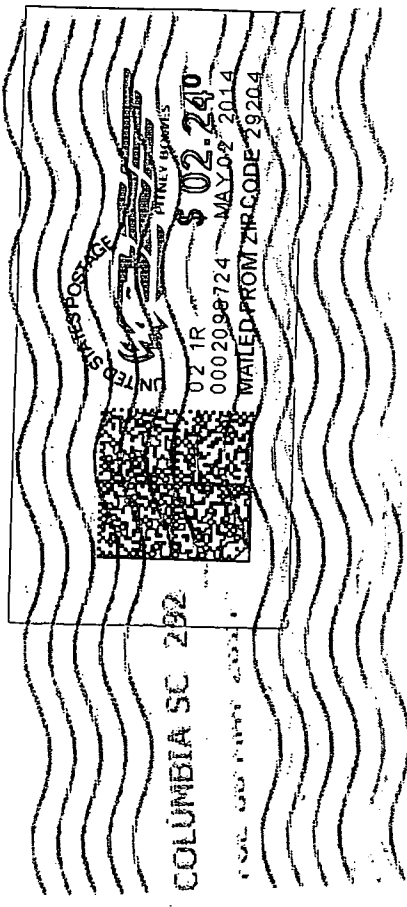
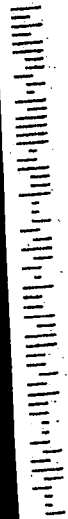
AFL/  
Enclosure

cc: Reynolds Williams, Esquire

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**SC Court of Appeals**



**DAVIDSON & LINDEMANN, P.A.**

*Attorneys and Counsellors at Law*

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