

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

The Honorable G. Thomas Cooper  
The Honorable J. Ernest Kinard

Case No. 2011-CP-40-6705

**RECEIVED**

JUN 23 2014

**SC Court of Appeals**

JOSEPH S. AZAR, FRANK J. CUMBERLAND, JR.  
AND MICHAEL A. LETTS, INDIVIDUALLY  
AND AS CLASS REPRESENTATIVES, ..... APPELLANTS,

v.

CITY OF COLUMBIA, ..... RESPONDENT.

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

Due to unanticipated schedule and work load conflicts, Respondent City of Columbia hereby moves for a 30-day extension of time in which to file its Initial Brief and Designation of Matter to be included in the Record on Appeal. This is the Respondent's second request for an extension of time. Respondent's Brief is currently due on July 1, 2014. With a 30-day extension, Respondent's Brief will be due on July 31, 2014. Appellants have informed Respondent that they have no objection to this Motion.



Thomas E. Lydon (SC Bar No. 10242)  
M. McMullen Taylor (SC Bar No. 72848)  
McAngus Goudelock & Courie, LLC  
Post Office Box 12519  
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(803) 779-2300

*Attorneys for Respondent City of Columbia*

June 23, 2014

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v.

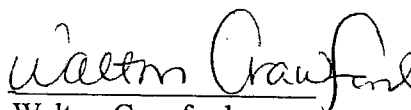
CITY OF COLUMBIA, ..... RESPONDENT.

CERTIFICATE OF SERVICE

I certify that I have served a copy of Respondent City of Columbia's Motion for Extension of Time by placing in the United States Mail, postage prepaid, on the 23<sup>rd</sup> day of June, 2014, addressed to counsel of record, as follow:

C. Dixon Lee, III  
McLauren & Lee  
Post Office Box 11809  
Columbia, South Carolina 29211

Gene M. Connell, Jr.  
Kelaher, Connell & Connor, P.C.  
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Walton Crawford

Paralegal to M. McMullen Taylor  
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**Reply To**

M. McMULLEN TAYLOR  
Direct Dial: (803) 227-4945  
mullen.taylor@mgclaw.com

June 23, 2014

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

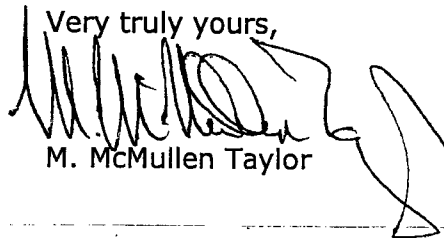
RE: Joseph S. Azar, Frank J. Cumberland, Jr., and Michael A. Letts,  
Individually and as Class Representatives, Appellants, v. City of Columbia,  
Respondent  
Our File No.: 20203.11129  
Appellate Case No. 2014-000032

Dear Ms. Kitchings:

Enclosed please find an original and one copy of Respondent City of Columbia's Motion for Extension of Time to File its Initial Brief and Designation of Matter, as well as the \$25.00 motion fee. Please return the file-stamped copy to my runner. By copy of this letter, I am hereby serving this Motion upon Appellants.

If you have any questions, please contact me.

Very truly yours,



M. McMullen Taylor

enclosures

cc: Dixon Lee, Esquire  
Gene Connell, Esquire

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JUN 23 2014

**SC Court of Appeals**