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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Doyet A. Early, III, Circuit Court Judge

Case No. 2009-CP-02-1529

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JUN 10 2014
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.

AND

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 Charles Cain is the Respondent.

**MOTION FOR EXTENSION
TO FILE FINAL BRIEFS**

The Respondents Michael E. Hunt and Charles Cain respectfully move this Court for an extension of time until twenty days after the Appellant has served a corrected Record on Appeal by which to file the Respondents' Final Briefs.

The Respondents' motion is based on the following grounds:

1. Final Briefs are currently due to be filed and served on June 11, 2014.
2. In reviewing the Record on Appeal as prepared by Appellant's counsel, it was determined that there are corrections to the Record on Appeal that need to be made prior to the preparation and filing of the Final Briefs.
3. John C. Bradley, Jr., who is counsel for the Appellant, has acknowledged that there are errors in the Record on Appeal that require correction, and it is anticipated that the Appellant will be filing a motion seeking leave of court to make such corrections. Mr. Bradley has also consented by reply email to the requested extension.

WHEREFORE, the Respondents respectfully request that they be allowed additional time by which to file and serve their final briefs.

DAVIDSON & LINDEMANN, P.A.

BY: 

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Counsel for Respondent Michael E. Hunt

BY: Matthew B. Rosbrugh / w/ permission

MATTHEW B. ROSBRUGH

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Counsel for Respondent Charles Cain

Columbia, South Carolina

June 10, 2014

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CERTIFICATE OF SERVICE

RECEIVED

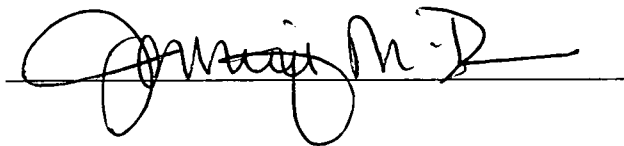
JUN 10 2014

SC Court of Appeals

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Defendant Michael E. Hunt, does hereby certify that service of the **Motion for Extentsion to File Final Briefs** 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 addresses clearly indicated on said envelopes this the 10th day of June 2014:

S. Jahue Moore, Esquire
John C. Bradley, Jr., Esquire
Moore Taylor Law Firm, P.A.
Post Office Box 5709
West Columbia, South Carolina 29171

Matthew B. Rosbrugh, Esquire
MBR Law, LLC
Post Office Box 292290
Columbia, South Carolina 29229

A handwritten signature in black ink, appearing to read "Matthew B. Rosbrugh", is written over a horizontal line.

DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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June 10, 2014

Of Counsel
Kenneth P. Woodington

Writer's Email: alindemann@dml-law.com

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Edgar Brown Building
1205 Pendleton Street
Columbia, South Carolina 29201

RE: William R. Ferrara v. Michael E. Hunt, Sheriff of Aiken County and Charles Cain in his individual capacity as Deputy Sheriff
Appellate Tracing Numbers: 2013-000826 and 2013-001909
Civil Action Number: 2009-CP-02-1529
Claim Numbers: 1-0801692-001 & 1-0801693-001
Our File Number: 333.8194

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension to File Final Briefs** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier. I have also enclosed my firm's \$25.00 check for the filing fee.

By copy of this letter, I am serving a copy on all counsel. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

cc: S. Jahue Moore, Esquire (w/ *Enclosure*)
John C. Bradley, Jr., Esquire (w/ *Enclosure*)
Matthew B. Rosbrugh, Esquire (w/ *Enclosure*)