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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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**RECEIVED**  
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

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*Counsel for Respondent Charles Cain*

Columbia, South Carolina

June 10, 2014

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In The Court of Appeals

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CERTIFICATE OF SERVICE

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**RECEIVED**

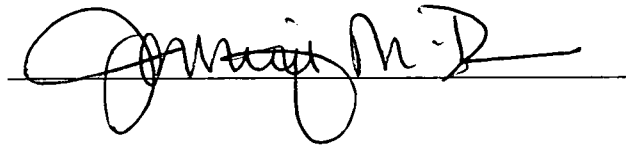
JUN 10 2014

**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. The signature is stylized and cursive.

# DAVIDSON & LINDEMANN, P.A.

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†Certified Mediator

June 10, 2014

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto: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)