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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

AUG 18 2014

**SC Court of Appeals**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2012-CP-40-07273  
Appellate Case No. 2014-000961

Betty J. Keitt.....Appellant,

v.

City of Columbia.....Respondent.

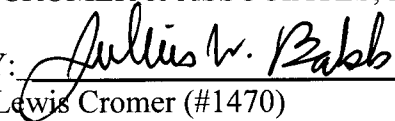
**MOTION FOR FIRST EXTENSION TO FILE  
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

The Appellant, Betty J. Keitt, through her undersigned counsel, hereby requests of this Honorable Court an extension of time in which to file Appellant's Initial Brief and Designation of Matter in the above referenced matter. The undersigned's office received the Transcript of the Record from Elizabeth B. Harris, Circuit Court Reporter, on August 1, 2014. Pursuant to Rules 208 & 209, SCACR, Appellant's Initial Brief and Designation of Matter are due September 1, 2014. Plaintiff's counsel has been called to trial beginning August 25, 2014 in the Court of Common Pleas for the Twelfth Judicial Circuit in Florence, South Carolina and he is in the process of preparing his case, his client and out of town witnesses for trial. These obligations, among others, necessitate an extension of time in order for the undersigned to prepare the

Appellant's Initial Brief and Designation of Matter.

Pursuant to the grounds listed above, the undersigned respectfully requests a thirty (30) day extension in which to prepare Appellant's Initial Brief and Designation of Matter. A thirty (30) day extension would move this deadline to October 1, 2014. The undersigned certifies that this motion for extension is not being done as a delaying tactic and is in the furtherance of justice for Appellant.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

BY:   
\_\_\_\_\_  
J. Lewis Cromer (#1470)  
Julius W. Babb, IV (#77216)  
1522 Lady Street  
Post Office Box 11675  
Columbia, South Carolina 29211  
Phone 803-799-9530  
Fax 803-799-9533

Attorneys for Plaintiff

August 15, 2014  
Columbia, SC

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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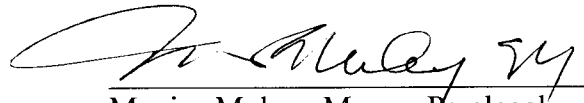
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**PROOF OF SERVICE**

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This is to certify that the undersigned employee of J. Lewis Cromer & Associates, LLC, did cause to have served on August 15, 2014, a copy of the **APPELLANT'S MOTION FOR FIRST EXTENSION TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**, via First Class Mail, postage prepaid, to the following counsel of record, at the below indicated address:

W. Allen Nickles, III, Esquire  
The Nickles Law Firm  
1122 Lady Street, Suite 610  
Columbia, South Carolina 29202



Monica Mulvey Mcgee, Paralegal  
J. Lewis Cromer & Associates, LLC  
1522 Lady Street  
Post Office Box 11675  
Columbia, South Carolina 29211  
Phone 803-799-9530

August 15, 2014  
Columbia, SC

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**J. LEWIS CROMER**  
**& ASSOCIATES** L.L.C.  
ATTORNEYS AND COUNSELORS AT LAW

J. LEWIS CROMER  
JULIUS W. BABB, IV • J. PAUL PORTER  
ASHLEY C. STORY • RYAN K. HICKS

August 15, 2014

Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: ***Betty Keitt v. City of Columbia***  
C/A No.: 2012-CP-40-7273

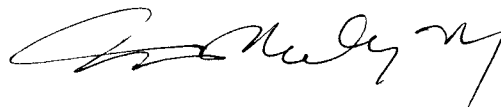
Dear Ms. Kitchings:

Please find enclosed the original and one copy of Appellant's Motion for Extension of Time to file her Appellant's Brief and Designation of Matter in connection with the above referenced matter. We have also enclosed our firm's check in the amount of \$25.00, representing the filing fee of same. Please file the original and return the clocked copy to me using the enclosed envelope.

By copy of this letter and enclosures to counsel of record, I am serving same on him.

With kind regards, I remain

Sincerely,



Monica Mulvey Mcgee  
Paralegal

cc: Al Nickles, Esquire  
Betty Keitt

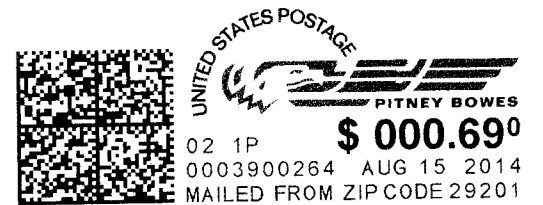
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**SC Court of Appeals**



J. Lewis Cromer & Associates, LLC  
P. O. Box 11675  
Columbia, SC 29211-1675



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