

THE STATE OF SOUTH CAROLINA  
In the South Carolina Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Court of Appeals Case No. 2013-002580

RECEIVED

SEP 22 2014

SC Court of Appeals

Christopher A. Wellborn .....Appellant,

v.

City of Rock Hill.....Respondent.

MOTION FOR EXTENSION OF TIME IN WHICH  
TO FILE RESPONDENT'S FINAL BRIEF

Respondent moves for an extension of time of ten (10) days from the date of the current deadline, until October 2, 2014, to file Respondent's Final Brief. The current deadline is Monday, September 22, 2014, given the fact that the thirtieth day since the Appellant served his Final Brief is a weekend day. The Respondent's grounds for the request are as follows:


Respondent's undersigned attorney spent several days during the week of August 22<sup>nd</sup> in the hospital, followed by two (2) weeks to focus on and accomplish the preparatory tasks necessary for the September 8-12, 2014 jury trial term. Of the 227 cases scheduled for the October 6<sup>th</sup>-8<sup>th</sup> jury trial term, 93 belong to the undersigned. Accordingly, the undersigned spent the week of September 15<sup>th</sup>-19<sup>th</sup> reviewing, docketing, and beginning preliminary preparatory tasks for the individual cases for the upcoming term of court. The undersigned will be out of town from this weekend through late Wednesday, September 25<sup>th</sup>.

The undersigned must complete the work on the Final Brief, edit the changes, and submit

the final copy to the City's print shop for binding. Said tasks should be completed and the briefs readied for filing within the ten-day extension as requested above.

The Respondent respectfully requests that the Court extend the deadline to file the Final Brief of Respondent until October 2, 2014. Further, Respondent requests that the current deadline be held in abeyance while this motion is pending.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Paula Knox Brown", written over a horizontal line.

Paula Knox Brown  
Attorney for Respondent  
201 E. Main Street, Suite 300  
Rock Hill, South Carolina 29730  
803-329-5641

September 19, 2014  
Rock Hill, SC

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CERTIFICATE OF SERVICE

I, Paula Knox Brown, hereby certify that I served the *Respondent's Motion for Extension of Time in which To File Respondent's Final Brief* on Counsel for Appellant, James Boyd, Esquire, by depositing a copy of the document in the United States mail, with sufficient postage affixed, on the 19<sup>th</sup> day of September, 2014. The envelope was addressed as follows:

James W. Boyd, Esquire  
Post Office Box 36425  
1544 Ebenezer Road  
Rock Hill, SC 29732.



Paula Knox Brown  
Attorney for Respondent  
201 E. Main Street, Suite 300  
Rock Hill, South Carolina 29730  
803-329-5641

September 19, 2014  
Rock Hill, SC



September 19, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: Christopher Wellborn  
v.  
City of Rock Hill  
Case No. 2013-002580

Dear Ms. Kitchings:

Enclosed is a copy of the *Respondent's Motion for Extension of Time in which To File Respondent's Final Brief* for the Court's consideration with a Certificate of Service. Please file the originals. I am forwarding a copy to James Boyd, Attorney for Appellant.

Sincerely,

Paula Knox Brown  
City Solicitor

cc: Christopher Barton, Senior Solicitor (via hand-delivery)  
James Boyd, Esquire

DELIVERED VIA FACSIMILE TRANSMITTAL TO 803-734-1839 AND VIA REGULAR UNITED STATES MAIL

**RECEIVED**

SEP 22 2014

CITY OF ROCK HILL SOLICITOR'S OFFICE

201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730  
OFFICE 803/329-5619 FACSIMILE 803/326-3865

**SC Court of Appeals**



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