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November 19, 2014

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SC Court of Appeals

74212

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: Evalena Catoe, individually and as Personal Representative of the Estate of Richard L. Catoe, Jr., deceased v. The City of Columbia and Leon Lott, in his official capacity as Sheriff of Richland County
Appellate Case Number: 2014-000194
Civil Action Number: 2013-CP-40-1047R
Our File Number: 314.8165

Dear Ms. Kitchings:

This letter is to request a five day extension of time until November 24, 2014, in which to file the Initial Brief of Respondent Leon Lott and his Designation of Matter to be Included in the Record on Appeal with regard to the above referenced matter. Other obligations and deadlines have prevented me from completing the initial brief by the current deadline. Specifically, in the past week, I had another appellate brief due in the South Carolina Court of Appeals and one appellate brief due in the South Carolina Supreme Court. In addition, I have another appellate brief due on November 20, 2014. The Appellant's Amended Brief is quite lengthy and I need some additional time to complete the response brief. I have consulted with Appellant's counsel who has kindly consented to the requested extension by reply email (see attached).

By my calculations, the Initial Brief of Respondent Leon Lott and his Designation of Matter to be Included in the Record on Appeal will now be due on or before November 24, 2014. I have also enclosed my firm's \$25.00 check for the filing fee. If you require a formal motion, please advise.

Thank you very much for your consideration of this request.

The Honorable Jenny Abbott Kitchings
November 19, 2014
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Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosure

cc: Pamela R. Mullis, Esquire
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Andrew Lindemann

From: Pamela Mullis <PRMullis@mullislawfirm.com>
Sent: Wednesday, November 19, 2014 10:44 AM
To: Andrew Lindemann
Cc: Jennifer M. Baker
Subject: RE: Catoe v. Lott

Help yourself –
Pam

Pamela R. Mullis
MULLIS LAW FIRM
(803) 799-9577
PRMULLIS@MULLISLAWFIRM.COM

From: Andrew Lindemann [<mailto:alindemann@dml-law.com>]
Sent: Wednesday, November 19, 2014 8:44 AM
To: Pamela Mullis
Cc: Jennifer M. Baker
Subject: Catoe v. Lott
Importance: High

Pam:

I need a favor. I am in a bind because of two other briefs that I had due, plus another one tomorrow. Would you consent to an extension through Monday – 5 additional days for me to file the Initial Brief of Respondent in this case. I would definitely appreciate it.

I need to get a letter/motion to the Court this morning. If you could let me know as soon as possible, I'd appreciate it,

Thanks.

Andrew